



# **Analysis of Impediments To Fair Housing Choice**

City of Glendale, Arizona

**April 2015**

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## **I. INTRODUCTION**

### **Analysis of Impediments Background**

As a recipient of federal block grant funds including Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD), the City of Glendale must certify that it will “affirmatively further fair housing” (AFFH) in accordance with federal regulatory requirements at 24 CFR 91.225(a)(1). According to the HUD Fair Housing Planning Guide, the certification is both a statutory and a regulatory requirement for HUD grantees receiving CDBG funds.<sup>1</sup> The certification means that the City will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.<sup>2</sup> In addition to CDBG and ESG funds, the City of Glendale also receives HOME Investment Partnership Act (HOME) funds through its membership in the Maricopa County HOME Consortium.

In order to meet the certification requirements, the City conducted the Analysis of Impediments to Fair Housing Choice (AI) which is the subject of this report and studied impediments to fair housing choice in the public and private sector. The basis of the AI is the federal Fair Housing Act and equivalent state and local laws. The City of Glendale’s Community Revitalization Division contracted with ASK Development Solutions, Inc. (ASK), a consulting firm, to conduct the AI which was completed in April 2015.

### **Fair Housing Laws**

The Federal Fair Housing Act (FHA) or Title VIII of the Civil Rights Act of 1968, and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability (physical and mental). The persons represented in the above categories are referred to as “protected classes”. The FHA covers most housing types including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

The State of Arizona prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, disability or familial status, and retaliation under the Arizona Fair Housing Act. The Arizona Fair Housing Act applies to the sale, rental, and financing of residential housing. Apartments, houses, mobile homes, and even vacant lots to be used for housing are covered by the Fair Housing Act. With a few exceptions, anyone who has control over residential property and real estate financing must obey the law. This includes rental managers, property owners, real estate agents, landlords, banks, developers, builders, and individual homeowners who are selling or renting their property. Based on research performed on HUD’s website, the Civil Rights Conflict Resolution Section of the Arizona Attorney General’s Office is certified by HUD as a substantially equivalent agency.

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<sup>1</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 1-2)* March 1996

<sup>2</sup> <http://www.gpo.gov/fdsys/pkg/CFR-2004-title24-vol1/pdf/CFR-2004-title24-vol1-sec91-225.pdf>.

U.S. Government Printing Office retrieved March 20, 2015

## **Purpose of the AI**

The HUD Fair Housing Planning Guide provides the following definitions and outlines the purpose of the AI.

According to HUD, impediments to fair housing choice are any actions, omissions, or decisions:

1. *That are taken because of* someone's membership in one of the "protected classes" and that restrict housing choices or the availability of housing.
2. *That has the effect of* restricting housing choices or the availability of housing choices on the basis of membership in the protected classes.

The AI involves:

- A review of the City's demographic, economic, and housing characteristics;
- A review of a City's laws, regulations, policies, procedures, and practices and how they affect the location, availability, and accessibility of housing;
- Public education outreach efforts, and a community fair housing survey;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes; and
- Identifying any existing impediments or barriers to fair housing choice, and developing an action plan containing strategies to overcome the effects of any impediments identified in the AI.<sup>3</sup>

HUD states that the purposes of the AI are to:

- Serve as the substantive, logical basis for fair housing planning;
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts within a City and beyond.<sup>4</sup>

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<sup>3</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-7) March 1996

<sup>4</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-8) March 1996

## **Public Participation in the AI**

In accordance with the City Citizen Participation Plan and Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i), the City of Glendale conducted an inclusive community participation process that included input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. The following strategies were used:

1. Fair Housing Surveys-Fair housing surveys targeted to residents, housing service providers/advocates, Realtors, and lending institutions were administered online and by paper. Website links to the four fair housing surveys were posted on the City's website and distributed via emails, social media, and flyers. To cater to persons without internet access or computer familiarity, paper surveys were distributed to social service agencies, community centers, and meetings. The City's Community Action Program (CAP), which is a City department, was used to distribute surveys. The surveys were used to gather information about the respondents' experiences and perceptions of housing discrimination and their opinions on the fair housing laws, practices, and services in the City. The resident surveys were targeted to persons who resided, worked, or owned businesses within the City; and they were also provided in Spanish language.
2. Print and Broadcast Media – The City's Communications Department promoted the AI and the surveys on the City's government television station, and in The Glendale Star and Arizona Republic newspapers. Public meetings were advertised on the City's website, and in the Glendale Star and Arizona Republic newspapers. The draft AI was published for a 10-day comment period from April 20-30, 2015 on the City's website and available at the City's Community Revitalization Office at 5850 W. Glendale Drive. No comments were received.
3. Key Person Interviews - Interviews were conducted with key individuals from City staff, non-profits, HUD, and housing providers to collect additional information about fair housing practices and impediments in the City.
4. Public meetings, Presentations, and Focus Groups - Four public meetings and focus groups were conducted to solicit input on housing discrimination and impediments to fair housing from the City, various industry representatives, service providers, and the public at large. Information on the AI was also disseminated in the Consolidated Plan needs assessment meetings. Additional information was gathered via meeting, teleconference, and email correspondence with nonprofit and advocacy groups. Staff of the City of Glendale Community Revitalization Department also conducted presentations on the development of the AI at other locations.

## **Planning and Research Methodology**

The Fair Housing regulations of January 1989 do not include guidelines concerning how to affirmatively further fair housing. Requirements with review criteria and the areas to be covered by the analysis of impediments to fair housing choice were included in the CDBG regulations published in September 6, 1988. It was not until the Fair Housing Planning Guide was published that affirmatively furthering fair housing was defined.

The Guide provides suggested sources of data and studies, methods to obtain citizen participation, suggested outline, format for fair housing planning, sample of corrective actions and measurable results, and suggestions for complying with fair housing requirements for persons with disabilities. It should be noted that HUD does not require grantee to commence a data collection effort in order to complete an AI. HUD allows the grantees to use existing available data. Data includes HUD and Federal agency databases and studies, State and local information sources, private housing industry reports, and college university/research. Also, the Guide indicates that data from the Consolidated Plan can be used for the analysis of impediments.

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The consultant's methodology in conducting the 2014 Glendale AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (published by HUD's Office of Fair Housing and Equal Opportunity in 1996; experience conducting AIs for other cities, and the desires of the City's leadership. Revisions to fair housing strategies, easier access to data and improved ways of conducting the AIs has taken place since 1996. However, both HUD and program participants have recognized that the AFFH certification has not been as effective as it could be due to inconsistencies in conducting AI and in implementing the requirements. As a result, HUD published the "Affirmatively Furthering Fair Housing" Proposed Rule in July 2013. The intent of the rule as articulated in the Federal Register Notice is to "refine existing requirements with a fair housing assessment and planning process that will better aid HUD program participants fulfill this statutory obligation and address specific comments raised by the U.S. Government Accountability Office (GAO)."<sup>5</sup> Much of the proposed new methodology, data sets, formats, and instruments are still in development. However, as far as possible, criteria and areas of focus identified in the proposed rule are used in the development of this AI.

The following approach was used to gather and analyze data for use in identifying impediments to fair housing choice and making recommendations for addressing impediments found:

Task 1 - Community Data Review: Reviewed existing demographic, economic, employment and housing market information for the City using the Decennial 2000 and 2010 U.S. Census summary files; 2013 American Community Survey (ACS) that provides more current data between the census periods; and loan applications and denial data from the Home Mortgage Disclosure Act (HMDA).

Task 2 - Regulatory Review: Researched and collected information regarding Glendale's development regulations, planning and zoning codes, comprehensive plan housing element, building and design codes, housing policies, and programs that influence fair housing choice.

Task 3 - Compliance Data Review: Collected and analyzed all available data regarding compliance with local, state and federal Fair Housing Laws, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act and the Community Reinvestment Act (CRA). Consultant also analyzed reported HUD fair housing complaints from HUD, the Arizona Attorney General, and legal cases in the City and County that may have a bearing on fair housing practices.

Task 4 – Review of Previous Studies: A previous AI was completed in 2010 which identified impediments to fair housing choice and made recommendations. A review was conducted to determine the status of the recommendations, actions taken, and the whether the identified impediments still existed. Other local and regional studies were reviewed to identify impediments to fair housing choice in the City.

Task 5 – Review of Inventory of Affordable, Accessible Housing: Prepared an inventory of all affordable and accessible housing, both owner and rented, including location and distribution to determine the incidence of racial, ethnic, and income segregation of housing.

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<sup>5</sup> Government Printing Office, Federal Register, Volume 78, No. 139, Affirmatively Furthering Fair Housing. Proposed Rule, Published July 19, 2013,

<http://www.gpo.gov/fdsys/pkg/FR-2013-07-19/pdf/2013-16751.pdf> Retrieved March 10, 2015



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Task 6 - Internet Surveys, Direct Surveys, and Personal Interviews: Beginning September 23, 2014, online surveys were available to all Glendale residents and industry stakeholders. Surveys were directly administered at meetings or through non-profit agencies and public meetings conducted by both City staff and the consultant to secure input. Responses to fair housing surveys included 14 residents and five (5) stakeholders.

Task 7 - Identification and Analysis of Impediments: The findings were analyzed to determine the existence of impediments to fair housing choice in the City.

Task 8 – Recommendations and Action Planning

In consultation with City staff, a list of recommendations and an action matrix for addressing the identified impediments was developed. These recommendations shall be used as a basis for fair housing planning, monitoring and record keeping. The recommendations that are ultimately implemented will be determined by the City's resources, goals, and political will.

## Fair Housing Planning

While fair housing planning is not the main purpose of the AI, the Fair Housing Planning Guide identifies three AI components that guide fair housing planning as summarized below:

<b>Component 1</b> <b>The AI involves:</b>	<b>Assembling Fair Housing Information</b> <b>The information needed includes the following:</b>
A review of the grantee's laws, regulations, etc.; An assessment of how those laws, etc. affect the location, availability, and accessibility of housing; An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; Assessment of the availability of affordable, accessible housing in a range of unit sizes.	Housing policies, practices, and procedures; zoning and land use policies; Fair housing complaints/suits or other data; Demographic patterns; Home Mortgage Disclosure Act (HMDA) data; Results of testing; Results of (FHIP) grants; Patterns of occupancy in Section 8, Public and Assisted Housing, and private rental housing.
<b>Component 2</b>	<b>Fair Housing Actions</b>
Before developing actions to eliminate effects the grantee should: Ensure diverse groups participate in the developmental process; Create the structure for the design/ implementation of the actions. Steps to take before developing actions: Define objectives with measurable results; For each objective, the jurisdiction should have a set of goals or actions	Fair housing action(s) for each objective; Time period for completion; Resources from local, State, and Federal agencies; Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.
<b>Implement Fair Housing Actions</b>	
<ul style="list-style-type: none"><li>• Design achievable action, designed to address real fair housing problems</li><li>• Assess FHP activities on a regular basis</li></ul>	



### Self-Assessment

Fair housing planning should include a process for monitoring the progress in carrying out each action and evaluating effectiveness. The process should identify:

### Changes

Fair housing planning should include a process for making “mid-course” corrections, changes, or additions as the planned actions are underway.

### Component 3

### Maintenance of Records

- The AI final document.
- Actions to eliminate identified impediments.
- A description of the nature of the chief executive or governing body’s commitment to FHP.
- A description of the financial and in-kind support for FHP, including funds provided by the jurisdiction. A list of groups participating in the formulation of FHP.
- Transcripts of public meetings/forums and citizen comments/input.
- Progress reports.

The recommendations provided in this report are intended to serve as a basis for fair housing planning. The City should determine what recommendations it will act on, and which activities it will choose to conduct based on its priorities, goals, resources, and community needs.

### Data Limitations

It must be noted that the data gathered for the AI has limitations that affect conclusions reached. It is assumed by the preparers of the AI that all of the data used from official sources, regardless of source, are accurate. All data is not consistent in the level of information provided. For example, more current data sources such as ACS data may not have as many data sets to analysis as the census. It should be noted that the AI is a point in time study intended to analyze the current fair housing environment within the City of Glendale and identify impediments. Some of the impediments that are identified may need additional research and analysis.

Maps used in the AI represent data by census tracts with an overlay of the City boundaries. Census tract and block group boundaries do not match exactly and in some cases, census tracts are shared by adjacent municipalities. In addition, census boundaries between the 2000 and 2010 censuses may have changed. For the surveys, it must be noted that respondents were asked to respond based on personal knowledge. As such responses may be influenced by the respondents’ perception of housing discrimination and fair housing, certain neighborhoods, and understanding of terms. It was noted in several focus groups nationally that there is a greater awareness of discrimination based on race and less awareness of discrimination based on disability, especially mental disability. It was noted that in some cases segregation of housing may not be due to lack of inclusive public policy, but social and cultural factors beyond the City’s control.

Data analyzed from the review of local planning and zoning sources may be deemed to have potential effects or disparate impact on the member of the protected classes, but often there is no concrete data to support the potential impact. The use of studies from other parts of the country may be used to extrapolate potential effects in Glendale but may need more research to verify. Comments such as “this does not

happen in our town” are not unusual. Recommendations made by the preparer are intended to serve as a guide to fair housing planning. It is recognized that ultimately the actions to be taken by the City of Glendale will be determined by the City’s financial and human resources, the City leadership’s perceptions of the findings presented, and actions it wishes to take.

### **Summary of Previously Identified 2010 Impediments and Recommendations**

The following is a summary of 2010 impediments and recommended actions identified in the 2010 AI. A status of the recommendations is also included as Appendix #3 showing actions taken by the City, CDBG, other funds invested in fair housing activities and whether the City still consider the impediment as relevant in 2014-2015.

**Previous Impediment #1:** Inadequate access to fair housing education and lack of an adequate fair housing discrimination reporting system.

**Current status:** The City of Glendale now has a direct link on its Community Revitalization website to [www.azfairhousing.com](http://www.azfairhousing.com), a website dedicated to fair housing issues, and annually provides CDBG funding to Community Legal Services (CLS) to promote and provide legal assistance for fair housing. The City and CLS held fair housing events in June 2013 and 2014 for housing providers and the general public resulting in clients seeking CLS services. As a result of these workshops, there have been some one-on-one consultations with citizens by CLS Attorneys.

**Updated Recommendation(s):** The City has made significant strides in informing residents of Glendale about fair housing rights and how to report potential cases of discrimination. However, lack of fair housing education remains an impediment, especially for minorities.

**Previous Impediment #2:** Discrimination related to rental and owned properties.

**Current status:** The City distributes fair housing information throughout the City at various locations. Community Housing Division conducts mandatory landlord orientations.

**Updated Recommendation(s):** The City is already taking several actions to disseminate fair housing information but should explore using other methods such as social media and the City’s broadcast media. The City should also increase citizen input by having public meetings at more convenient times. The City should request more detailed reports from CLS that shows the basis of discrimination in fair housing complaints.

**Previous Impediment #3:** Lack of sufficient affordable housing choices.

**Current status:** The City plans for the provision of affordable housing in its Five-year Consolidated Plan and Annual Action Plan. The City utilized NSP 1 and NSP 3 funds for developing affordable housing.

**Updated Recommendation(s):** More recent housing data including CHAS data indicates that there is still a shortage of affordable housing in Glendale. The City should continue to implement the

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recommendations above to encourage the development of new affordable housing units as well as continue to utilize CDBG and HOME funding to provide and preserve affordable housing.

**Previous Impediment #4:** Lack of accessible housing.

**Current status:** The City's Design Guidelines still require ADA compliance, and in 2011, the City in partnership with Gorman and Company, constructed a 28-unit ADA compliant apartment complex as part of the City's Centerline Redevelopment effort. The City allows ADA modifications through the Single-family Rehabilitation Program and through the Glendale Home Modification Program. The Glendale Commission continues to have ongoing dialogue in regards to the supply of accessible housing. The City continues to include staff on the Commission on Persons with Disabilities.

**Updated Recommendation(s):** The City should continue to increase the supply of accessible housing units through funding the rehabilitation of single family housing units and accessibility modifications. The City should review its policies to determine if there are any requirements or conditions that limit the supply of accessible housing.

**Previous Impediment #5:** Inadequate public transportation.

**Current status:** The City is a member of the Regional Transportation Authority and is involved in the planning efforts to expand Phoenix MSA public transportation services. The City is also involved in planning and discussions regarding linking the Centerline area with other transportation corridors to employment and healthcare services.

**Updated Recommendation(s):** The City should include transportation needs for low- and moderate-income persons, persons with disabilities, and other special needs populations in its transportation planning efforts.

**Previous Impediment #6:** Establish formal mechanisms for regional solutions to fair housing issues.

**Current status:** The Maricopa County Consortium is currently working on formulating an Analysis to Fair Housing Plan on a regional basis that recognizes the uniqueness of each individual City. The City will continue to utilize CDBG funds for costs related to code enforcement activities in low- and moderate-income areas.

**Updated Recommendation(s):** The City should collect and maintain demographic data and socioeconomic characteristics of Glendale residents as well as data of housing supply and availability to ensure that, as plans are developed, the goals and objectives formulated are based on reliable information and account for all protected class members. The City should pursue regional fair housing initiatives through the HOME Consortium, where practical.

### **Current 2015 Impediments and Recommended Actions**

Based on the research and data available, the following is a summary of the current impediments to fair housing choice in both the public and private sectors in 2014-2015, and recommended actions to address them. It must be noted that there are some impediments that were previously identified that are also identified in this current list. For each impediment, recommendations were formulated to address them and are listed in more detail in section VII.

The following are impediments that were identified along with the proposed recommendations the City could use to address them in its fair housing planning.

**A. *Impediment: Challenges in accessing public transportation, especially for special needs populations.***

***Action: Increase access to public transportation and transit services for low- and moderate-income persons, and protected class members.***

**Recommendation #A-1:** In transportation planning and funding, the City should ensure that consideration is given to the needs of protected class members and low- and moderate- income persons including transit services and access to employment centers.

**B. *Impediment: Shortage of affordable and accessible housing for persons with disabilities, elderly persons, families with children, and other protected classes.***

***Action: Closely analyze policies and programs that assist the elderly, minorities, persons with disabilities, and families with children with affordable housing choices.***

**Recommendation #B-1:** Consider accommodating group homes under the same standards of other residential uses and avoiding the exclusion of housing for persons with disabilities from residential areas and undue hardship on group home operators.

**Recommendation #B-2:** Increase and retain homeownership through housing support services including housing counseling, credit counseling, and foreclosure prevention for minorities and low- and moderate income households.

**Recommendation #B-3:** Increase leveraging of public funding with private sector funds for the development of a variety of affordable housing units.

**Recommendation #B-4:** Assess and incorporate more land use policies that encourage the construction and preservation of affordable and accessible housing.

**C. *Impediment: Discriminatory lending practices may be disproportionately impacting minority populations based on loan denial rates.***

***Action: Work with lenders in Glendale to review their underwriting standards to determine whether loan decisions are being made equitably.***

**Recommendation #C-1:** Coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

**D. *Impediment: Lack of or inadequate fair housing education and enforcement in the rental community, as well as within the minority community and persons with disabilities.***

***Action: Continue fair housing education and outreach, and expand opportunities for fair housing training.***

**Recommendation #D-1:** Expand fair housing education and outreach efforts by increasing the number of public meetings, fair housing literature dissemination, use of social media, English and bilingual broadcast media ads, greater online access to fair housing information, and use of HUD fair housing videos.

**E. *Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.***

***Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.***

**Recommendation #E-1:** The City of Glendale should work with its partners to promote education and awareness about mental disabilities, and encourage its public housing Division to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

**F. *Impediment: Lack of awareness of the demographics and needs of protected class members in the City's planning process may hinder proactive responses to housing needs and choices.***

***Action: Align planning efforts to reflect the changing demographics of the City, and ensure the needs of all residents are considered.***

**Recommendation #F-1:** The City should include protected class demographic data in its planning process, including data on mental disabilities, if available.

**Recommendation #F-2:** The City should review its planning concepts of affordable housing and diverse communities contained in the Glendale 2025 The Next Step General Plan, and develop strategies to make these more of a reality using resources provided by HUD and best practices from other communities.

## **II. COMMUNITY PROFILE**

### **Introduction**

The 2010 U.S. Census represents the most recent data from the U.S. Census, and that data is used for this report when possible and available. Some areas of data-gathering, however, requires use of the American Community Survey (ACS) which provides most informational items as the decennial census, but not always at the lowest geographic levels. The ACS is an ongoing statistical survey that is annually conducted by the United States Census Bureau. The survey gathers information previously contained only in the long form of the decennial census.

The 2010 Census, American Community Survey, and a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; Community Reinvestment Act (CRA) reports; official City of Glendale planning and reporting documents; and direct communication with local agencies. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein.

The City of Glendale includes 70 census tracts and 215 census block groups. Of those tracts, 61 census block groups meet the HUD definition of low- to moderate- income census areas. Maps 1, 2, and 3 on the following pages show the City of Glendale's census tract boundaries, all census tracts by income levels, and low- to moderate- income census areas as defined by HUD.

### **Demographic Changes and their Implication for Fair Housing Choice**

Concerning populations' shifts and the implication it may have for fair housing choice, the same is documented in a study prepared by DC Data Warehouse and the Urban Institute, published by Noah Sawyer and Peter A. Tatian in October 2003. In this Study – Segregation Patterns in the District of Columbia 1980 through 2000 – the authors measured population changes and segregation in the District of Columbia. The Study defines segregation as the extent to which different groups are separated geographically from each other, and it focused on three different segregation measures: the dissimilarity index, the exposure index, and the diversity index.

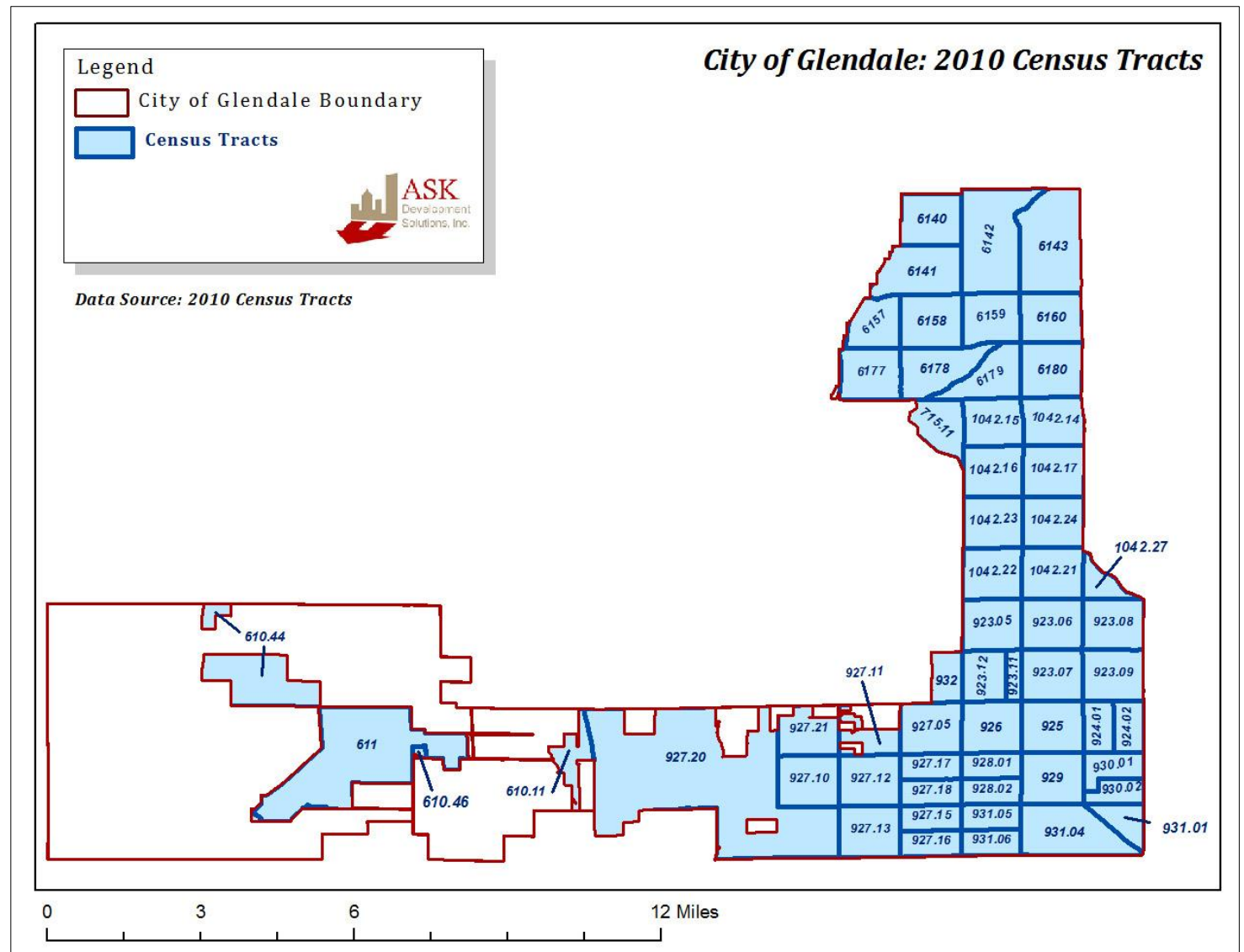
The study started by describing the District's racial and geographical population changes during the past 20 years. Afterwards the three measures of segregation were compared to examine how the diversity of the city has changed and how patterns of segregation have evolved over the past two decades. The major demographic trends in the District were decreased population by almost 70,000 residents from 1980 to 2000. The largest change among the four major racial/ethnic groups was in the black population. It decreased by almost 100,000 persons over the 20 years. The white population only decreased slightly. The decreases in black and white populations were partially offset by increases in Hispanic and Asian populations. Hispanic population grew by 27,000, an increase from 3% to 5% from 1980 to 2000. The Asian population grew by about 11,000 persons; now it represents 2% of the total population.

The findings of this Study confirmed that demographic changes produced a need for fair housing intervention.



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Map 1. 2010 Census Tracts - Glendale, AZ

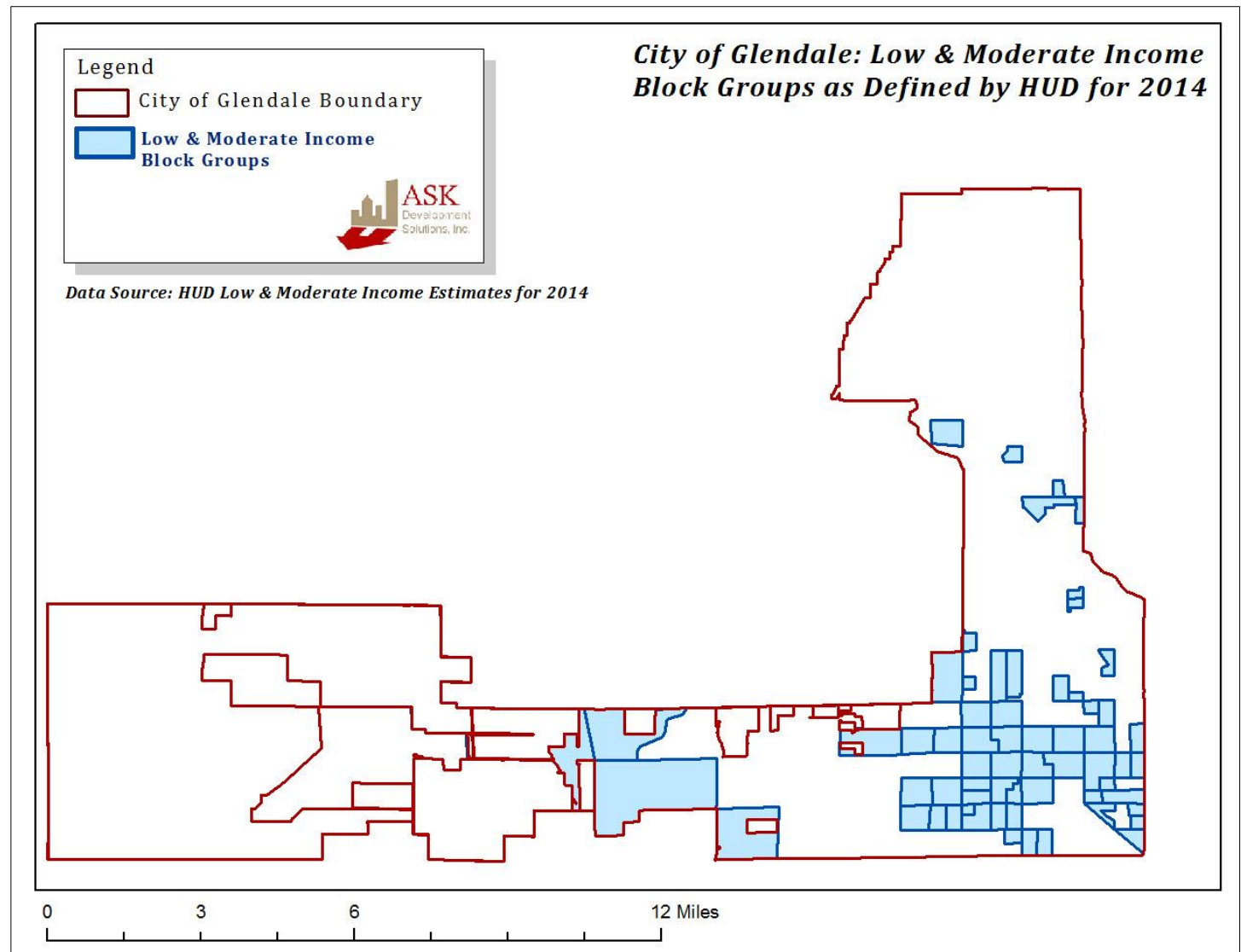


Source: 2010 U.S. Census





Map 3. Low- and- Moderate Income Block Groups - Glendale, AZ



Source: HUD Low & Moderate Income Estimates for 2014

### Population, Race, and Ethnicity

The City of Glendale had a total population of 226,721 persons at the time of the 2010 Census. The 2000 Census reflects a population of 218,812. Glendale's population grew by 7,909 persons (3.6%) over the ten- year period from 2000 to 2010. According to the 2010 Census, the racial makeup of the community was a majority White (67.8%), but also included populations identifying themselves as Black or African American (6.0%), Asian (3.9%), American Indian and Alaska Native (1.7%), Native Hawaiian and other Pacific Islander and other races(0.2%) ; including two or more (4.0%), and some other race (16.4%). Approximately 36% of the Glendale population identified themselves as being of Latino or Hispanic ethnic origin. Table 1 shows the demographic changes by race in Glendale between 2000 and 2010.

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Table 1. Population/Race/Ethnicity: 2000 and 2010 Census Change - Glendale, AZ

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 % Change
<b>Total Population</b>	218,812	100.0%	226,721	100.0%	3.6%↑
<b>Black or African American</b>	10,270	4.7%	13,686	6.0%	33.3%↑
<b>Asian</b>	6,003	2.7%	8,855	3.9%	47.5%↑
<b>American Indian and Alaska Native</b>	3,181	1.5%	3,784	1.7%	19.0%↑
<b>Native Hawaiian and Pacific Islander</b>	293	0.1%	430	0.2%	46.8%↑
<b>White</b>	165,293	75.5%	153,769	67.8%	7.0%↓
<b>Two or More Races</b>	7,584	3.5%	8,981	4.0%	18.4%↑
<b>Some Other Race</b>	26,188	12.0%	37,216	16.4%	42.1%↑
<b>Hispanic or Latino Origin</b>	54,343	24.8%	80,501	35.5%	48.1%↑

Source: 2000 and 2010 U.S. Census

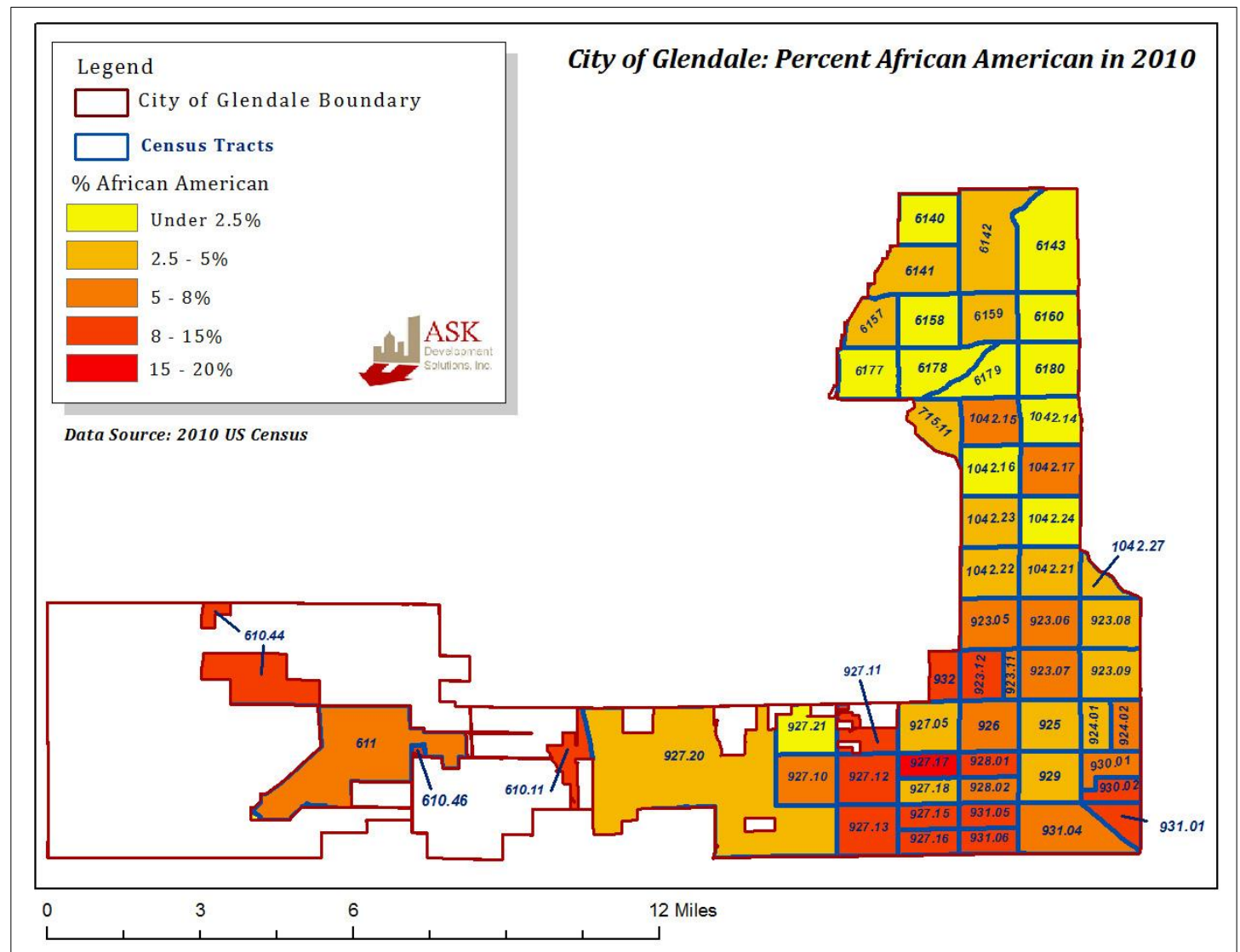
From the 2000 to 2010 Census counts, the White population declined by 7.0% while all other population groups increased. Glendale's Black or African American population increased by 33.3%; Asian population increased by 47.5%; American Indian and Alaska Native population increased by 19.0%; Native Hawaiian and other Pacific Islander population increased by 46.8%, the White population decreased by 7% moving from 165,293 to 153,769, persons with two or more races increased by 18.4%, persons of some other race increased by 42.1%, and Hispanic or Latino Ethnic Origin population grew by the largest overall percentage at 48.1%. Maps 4 and 5 illustrate the percentage of Black/African Americans and persons of Hispanic origin by census tract.

These overall demographic shifts, especially the increase in persons of Hispanic or Latino origin, could result in housing discrimination among those groups. As such the City should proactively increase its fair housing education and outreach to ensure that persons within these protected classes and all City residents are aware of rights and responsibilities under the federal and State's Fair Housing Acts.



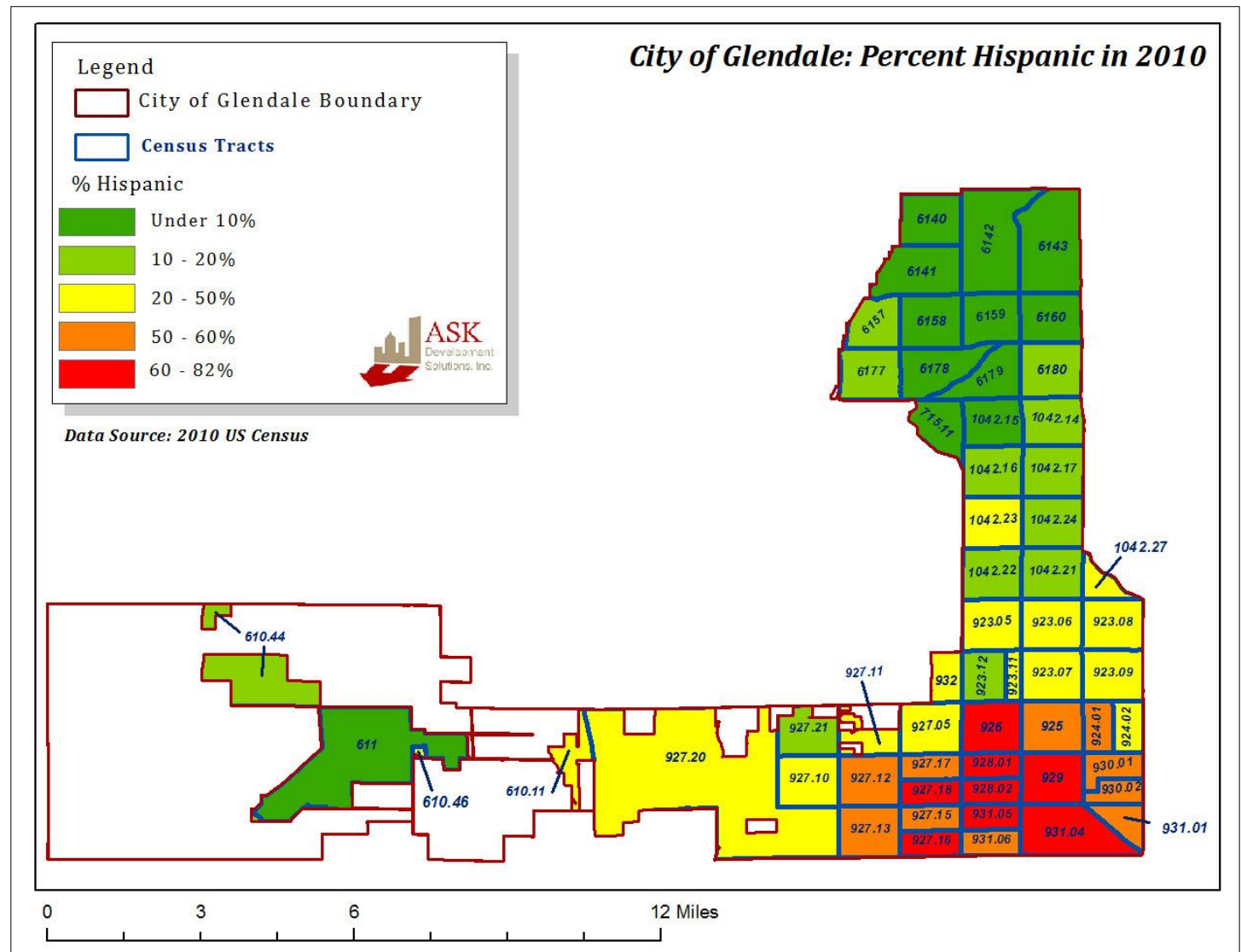
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Map 4. Percent Black/African American - Glendale, AZ



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Map 5. Percent Hispanic - Glendale, AZ



Source: 2010 U.S. Census

According to the 2013 American Community Survey (ACS 3-year estimate), 81.4% of the people living in Glendale were native residents of the United States. This is a decrease from the 2000 Census count of 87.3%. Forty-one percent (41%) of 2013 ACS residents were living in the state in which they were born.

In 2013, 17.5% of the people living in Glendale were foreign born (defined by the ACS as those born outside of the United States). This represents a 4.8 percentage point increase since the 2000 Census count of 12.7%. Of the foreign born population, 37.7% were naturalized U.S. citizens, and 62.3% were not U.S. citizens. As noted in Table 2 below, the mix of male and female population did not change significantly. Between 2000 and 2010, the male population increased by 2% and the female population increased by 5.2%.

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*Table 2. Gender: 2000 and 2010 Census Change - Glendale, AZ*

	<b>2000 Population</b>	<b>% of Total 2000 Population</b>	<b>2010 Population</b>	<b>% of Total 2010 Population</b>	<b>2000 to 2010 % Change</b>
<b>Male</b>	109,168	49.9%	111,387	49.1%	2.0%↑
<b>Female</b>	109,644	50.1%	115,334	50.9%	5.2%↑

Source: 2000 and 2010 U.S Census

### **Racially and Ethnically Concentrated Areas of Poverty**

The definition of a racially/ethnically-concentrated area of poverty (R/ECAP) as developed by the HUD Office of Policy Development and Research requires R/ECAPs to have a minority population of 50% or more and at least 40% of the individuals in the census tracts must be at or below the poverty line.

The data used for this analysis was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. The tract population, minority percentage, and poverty data is based on 2010 census data. Based on definition of R/ECAP there are four census tracts in Glendale where racial/ethnic groups are segregated. The census tracts are 928.01; 929; 931.01; and 931.04. There are 16,554 persons residing in the R/ECAP tracts of which 13,361 persons (80.7%) are minorities. The predominantly segregated group is of Hispanic/Latino origin representing 11,435 persons or 69% of all persons living in the R/ECAP tracts.

Information available from the Glendale Neighborhood Services Division indicates that the neighborhoods within these census tracts have high crime levels including gang and drug activity. The neighborhoods are also in need of infrastructure improvements (repaving of streets, lighting, and streetscape improvements) and code compliance monitoring due to dilapidated rental properties and vacant lots. Table 3 provides a breakdown of the minority population by race/ethnicity for the four R/ECAP tracts and the share of the total Glendale population.

*Table 3. Racially and Ethnically Concentrated Areas of Poverty - Glendale, AZ*

<b>R/ECAP Tracts</b>	<b>R/ECAP Population</b>	<b>Total Population</b>	<b>Share</b>
<b>Total Population</b>	16,554	226,721	7.3%
<b>Non-White</b>	13,361	109,855	12.2%
<b>Black/African-American</b>	1,228	12,766	9.6%
<b>Hispanic/Latino</b>	11,435	80,501	14.2%
<b>Asian/Pacific-Islander</b>	156	8,973	1.7%
<b>Native-American</b>	282	2,707	10.4%

Source: 2014 FFIEC Census Reports (based on 2010 SF 1 census data)

## Household Characteristics

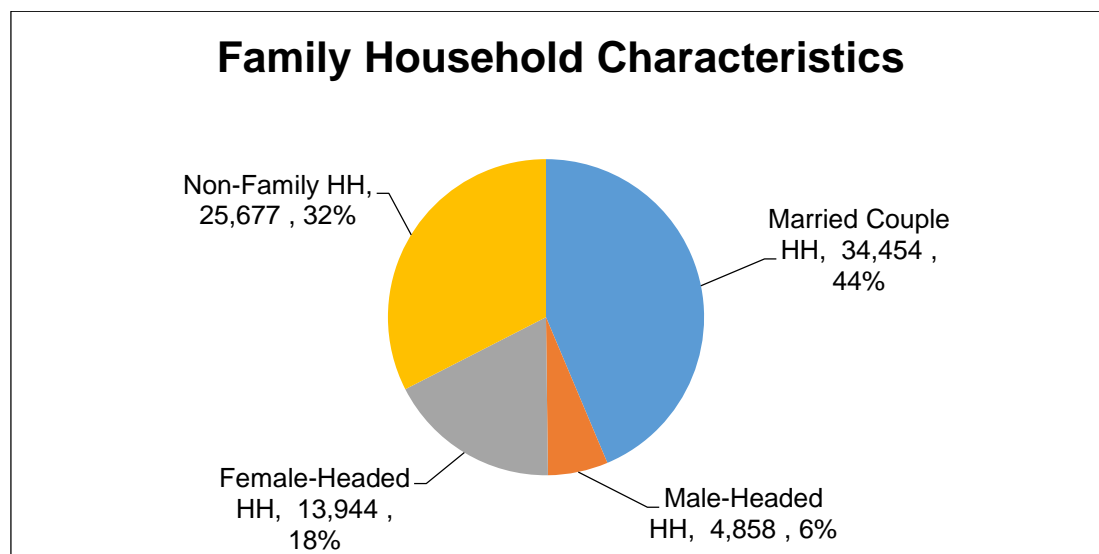
The average household size in Glendale was essentially unchanged between the 2000 Census and 2013 ACS. The average household size in Glendale in 2000 was 2.85 persons and, according to the 2013 ACS, the average household size was 2.89 persons per household. According to the 2013 ACS, among the 78,920 Glendale households, family households (households with family members related through birth, marriage, or adoption) represented 67.5% of all households (53,243 households), including 34,454 (43.7%) married couple family households; 4,845 (6.1%) male-headed households; and 13,944 (17.7%) female-headed households. Non-family households comprised a significant amount of the population at 25,677 (32.5%) of all households. Table 4 and Figure 1 show household characteristics in Glendale as of the 2013 ACS.

*Table 4. Households by Type - Glendale, AZ*

Households	78,920	100.0%
Family households	53,243	67.5%
With own children under 18 years	25,416	32.2%
Married-couple family	34,454	43.7%
With own children under 18 years	14,672	18.6%
Female householder, no husband present, family	13,944	17.7%
With own children under 18 years	8,382	10.6%
Non-family households	25,677	32.5%

Source: U.S. Census, 2009-2013 ACS 3-Year Estimate

*Figure 1. Household Characteristics - Glendale, AZ*



Source: U.S. Census, 2009-2013 ACS 3-Year Estimate

Table 5 provides information on marital status from the 2013 ACS. Among persons 15 and older, 42.6% of the population was married.



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*Table 5. Marital Status - Glendale, AZ*

Population 15 years and over	Persons	Percentage
<b>Total</b>	<b>181,462</b>	<b>100.0%</b>
Never married	67,832	37.4%
Now married, except separated	77,301	42.6%
Separated	4,127	2.3%
Widowed	8,694	4.8%
Divorced	23,508	13.0%

Source: U.S. Census, 2009-2013 ACS 3-Year Estimate

## Income, Education, and Employment

### Income Characteristics

The City of Glendale is located in Maricopa County. Maricopa County is part of the Phoenix-Mesa-Glendale, AZ MSA. The Phoenix-Mesa-Glendale, AZ MSA contains Maricopa County, AZ and Pinal County, AZ. Table 6 summarizes HUD's 2013 Income Limits for the Maricopa County, Arizona. All Based on a household size of four (4) and a 2013 Area Median Income of \$62,200 for Maricopa County, Extremely Low (30%) Income Limits are those persons earning no more than \$18,950; Very Low Income (50%) Income Limits are those persons earning no more than \$31,550; and Low Income (80%) Income Limits are those persons earning no more than \$50,500. Although Income Limits were available from HUD for other years, 2013 data was used for comparison with 2013 ACS data.

*Table 6. Income Limits Summary - Maricopa County, AZ*

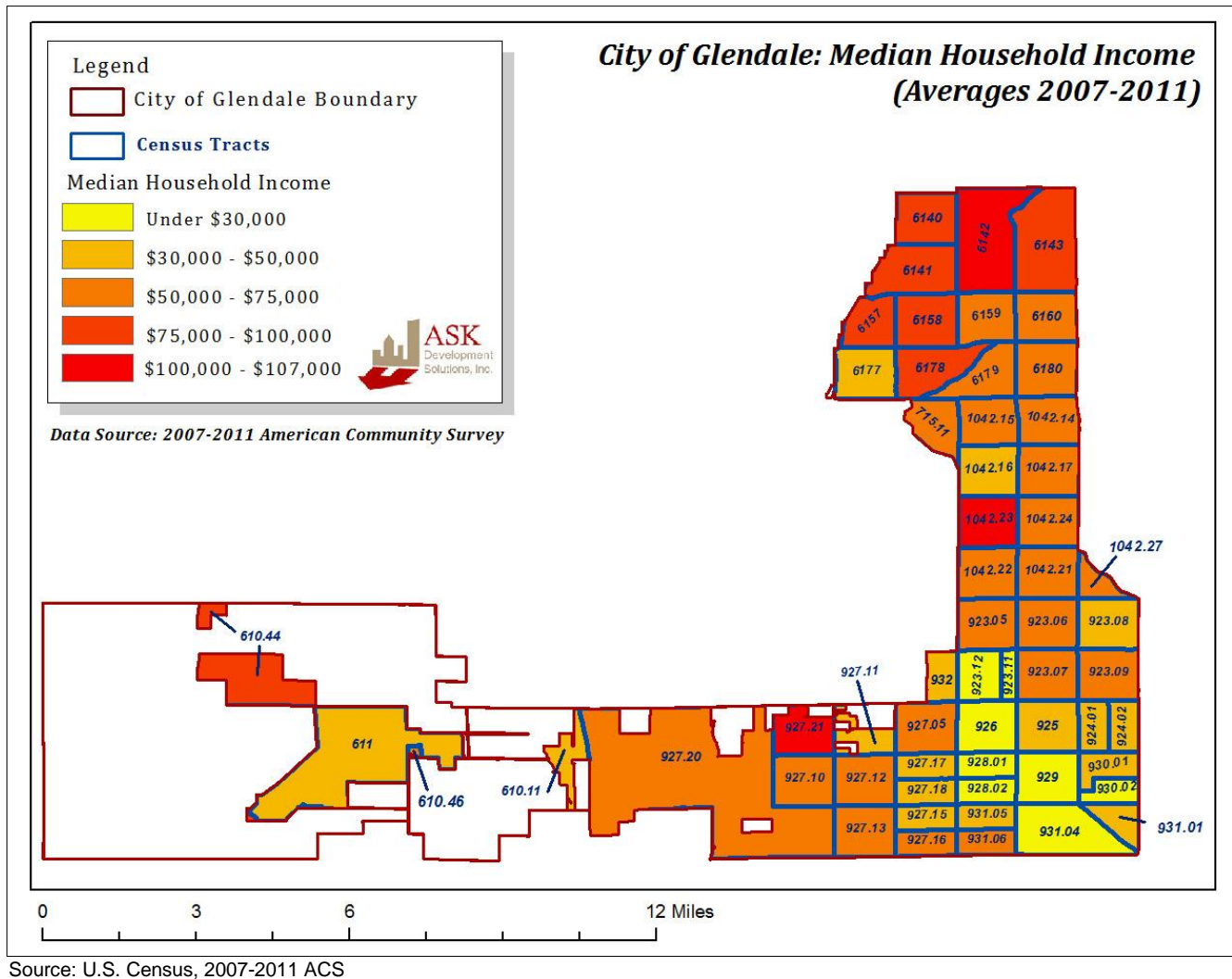
FY 2013 Income Limit Category	1 Person Household	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
<b>Extremely Low (30%) Income Limits</b>	\$13,300	\$15,200	\$17,100	<b>\$18,950</b>	\$20,500	\$22,000	\$23,500	\$25,050
<b>Very Low (50%) Income Limits</b>	\$22,100	\$25,250	\$28,400	<b>\$31,550</b>	\$34,100	\$36,600	\$39,150	\$41,650
<b>Low (80%) Income Limits</b>	\$35,350	\$40,400	\$45,450	<b>\$50,500</b>	\$54,550	\$58,600	\$62,650	\$66,700

Source: U.S. Department of Housing and Urban Development (HUD)

According to the 2013 HUD Income Limits Summary, the median household income in Maricopa County was \$62,200. Within just the city limits of Glendale, however, there was a lower median household income of \$45,375 (2013 ACS). In 2000, the City of Glendale median household income was \$45,015 (2000 U.S. Census).

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Map 6. Median Household Income - Glendale, AZ



The 2013 ACS further illustrates that of the total 78,920 households in Glendale, 26.7% (21,090) earned less than \$25,000 annually, with another 27.1% (21,394) having earned between \$25,000 and \$50,000. For the middle and upper income brackets in 2013, 18.5% (14,625) earned between \$50,000 and \$75,000; 10.9% (8,573) earned between \$75,000 and \$100,000; and 16.7% (13,238) earned \$100,000 and up. See Table 7 for the breakdown of households by income level.

Table 7. Household Income Levels - Glendale, AZ

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	6,547	8.3%
\$10,000 to \$14,999	5,247	6.6%
\$15,000 to \$24,999	9,296	11.8%
\$25,000 to \$34,999	10,091	12.8%
\$35,000 to \$49,999	11,303	14.3%

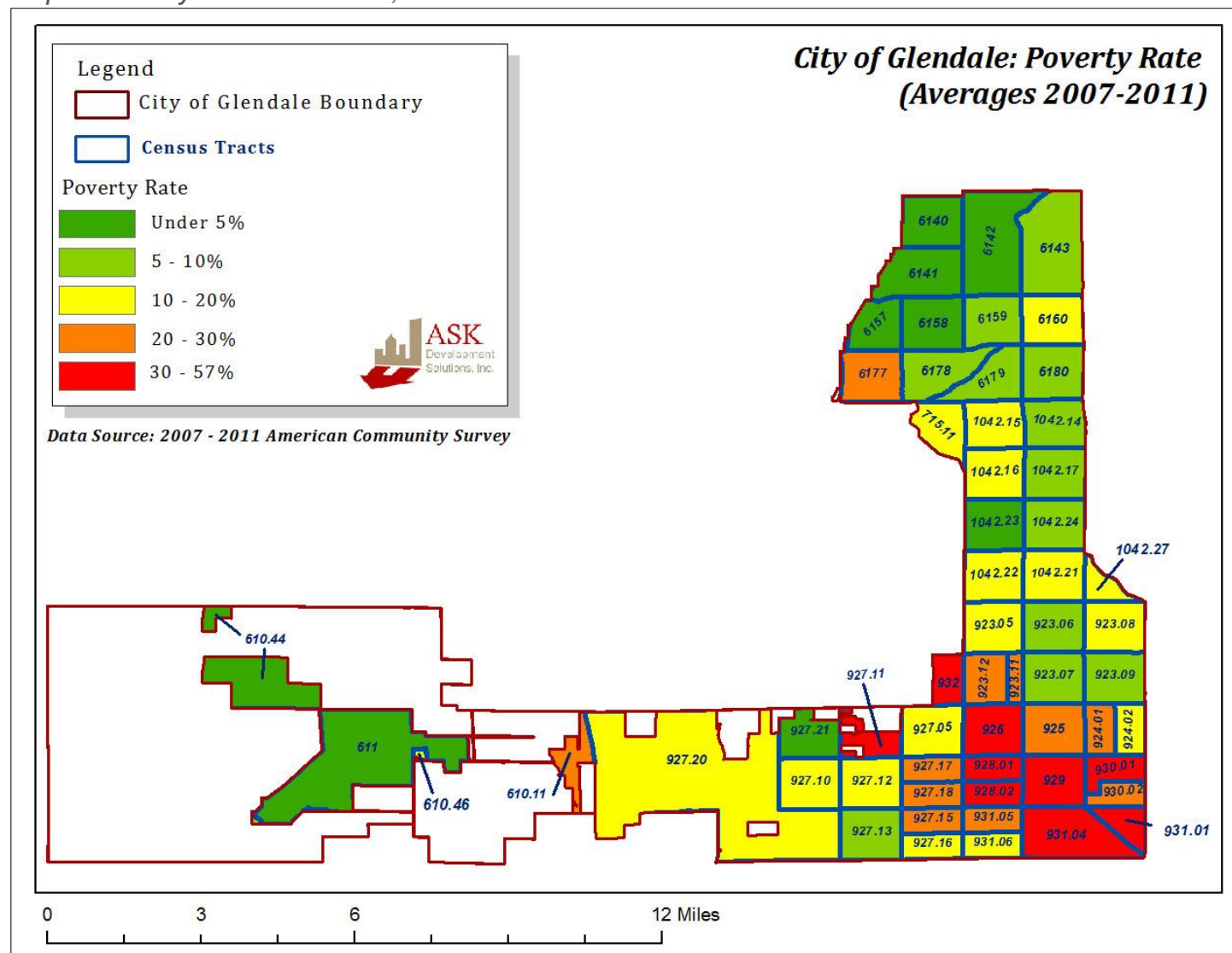
# Analysis of Impediments to Fair Housing Choice, April 2015 City of Glendale, AZ

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
\$50,000 to \$74,999	14,625	18.5%
\$75,000 to \$99,999	8,573	10.9%
\$100,000 to \$149,99	8,700	11.0%
\$150,000 to \$199,999	2,786	3.5%
\$200,000 or more	1,752	2.2%

Source: U.S. Census Bureau, 2009 – 2013 ACS 3-Year Estimate

Per the 2013 American Community Survey, 22.5% of the Glendale population subsists below the poverty level. This reflects a significant increase from 2000, when 11.9% of the population was below poverty level. In 2013, people ages 65 years and over had experienced an overall lower rate of poverty at 10.1%.

Map 7. Poverty Rate - Glendale, AZ



Source: U.S. Census, 2007-2011 ACS

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Families also experienced an overall lower rate of poverty in 2013 at 17.8%, and married couple families had a significantly lower rate, living below the poverty level at 9.8%. Female-headed households experienced poverty at the greatest rate of all groups: 35.4% of female households with no husband present; 41.8% of female households with related children less than 18 years old; and 47.6% of female households with related children less than 5 years old only. This measurement is particularly stark when compared to their incidence in the total population (female headed households with children make up 10.6% of all Glendale households). See tables 8 and 9 for the percentage of people and families living below the poverty level, respectively.

Of the 78,920 estimated Glendale households in 2013, 23.7% received Social Security income; 4.9% received Supplemental Security Income; 2.7% received cash public assistance income; 15.4% received retirement income; and 19.3% received Food Stamp/SNAP benefits.

*Table 8. People Living below the Poverty Level - Glendale, AZ*

<b>All People</b>	<b>22.5%</b>
<b>Under 18 Years</b>	<b>34.4%</b>
<b>Related Children Under 18 Years</b>	<b>34.1%</b>
<b>Related Children 5 to 17 Years</b>	<b>32.6%</b>
<b>Related Children Under 5 Years</b>	<b>38.1%</b>
<b>18 Years and Over</b>	<b>18.2%</b>
<b>18 to 64 Years</b>	<b>19.5%</b>
<b>65 Years and Over</b>	<b>10.1%</b>
<b>People in Families</b>	<b>21.2%</b>
<b>Unrelated Individuals 15 Years and Over</b>	<b>28.5%</b>

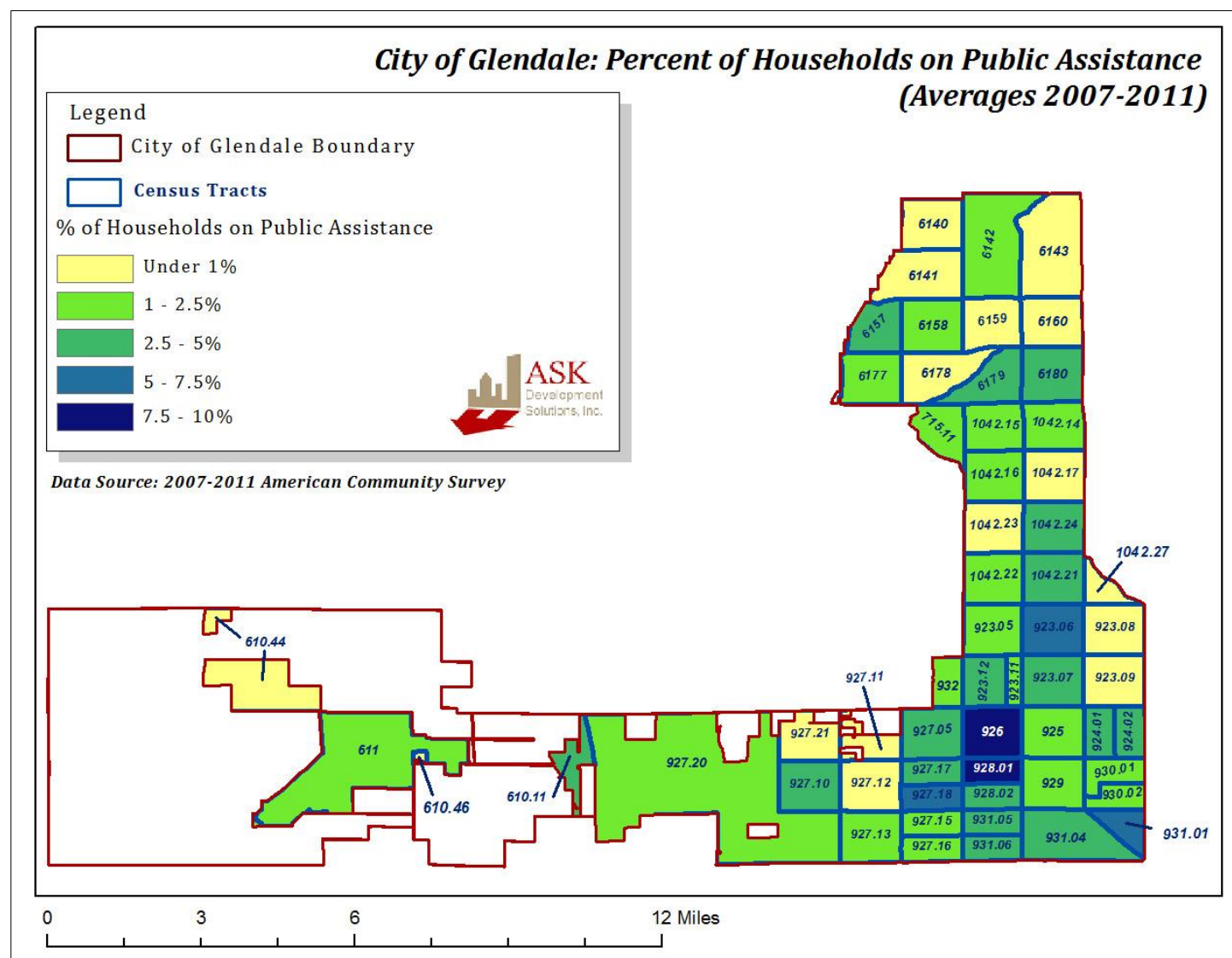
Source: U.S. Census Bureau, 2009-2013 ACS 3-Year Estimate

*Table 9. Families Living below the Poverty Level – Glendale, AZ*

<b>All Families</b>	<b>17.8%</b>
<b>With Related Children Under 18 Years</b>	<b>27.0%</b>
<b>With Related Children Under 5 Years Only</b>	<b>27.7%</b>
<b>Married Couple Families</b>	<b>9.8%</b>
<b>With Related Children Under 18 Years</b>	<b>16.9%</b>
<b>With Related Children Under 5 Years Only</b>	<b>17.4%</b>
<b>Families With Female Householder, No Husband Present</b>	<b>35.4%</b>
<b>With Related Children Under 18 Years</b>	<b>41.8%</b>
<b>With Related Children Under 5 Years Only</b>	<b>47.6%</b>

Source: U.S. Census Bureau, 2009-2013 ACS 3-Year Estimate

Map 8. Percentage of Households on Public Assistance



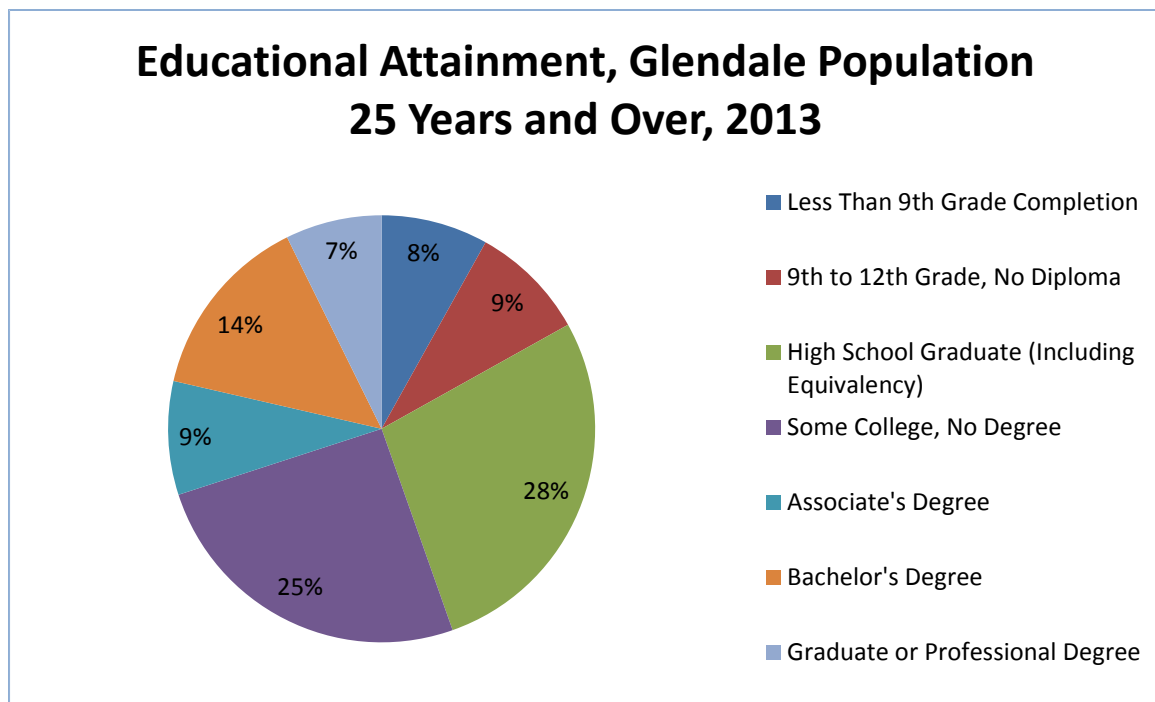
Source: U.S. Census Bureau, 2007-2011 ACS

### Educational Attainment

Within the 2013 Glendale population of persons 25 years and over, 27.7% of people had at least graduated from high school (including equivalency), 14.1% had a bachelor's degree, and 7.3% had a graduate or professional degree. Of the same population (25 years and older), 16.9% had less than a high school education diploma. See Figure 2, below.



Figure 2. Educational Attainment - Glendale, AZ



Source: U.S. Census Bureau, 2009-2013 ACS 3-Year Estimate

The total school enrollment for the population aged 3 years and over in Glendale was 65,369 in 2013 (ACS). School enrollment is broken down into the following categories: 3.4% in nursery school/preschool; 4.9% in kindergarten; 41.9% in elementary school (grades 1-8); 21.6% in high school; and 28.1% in college or graduate school.

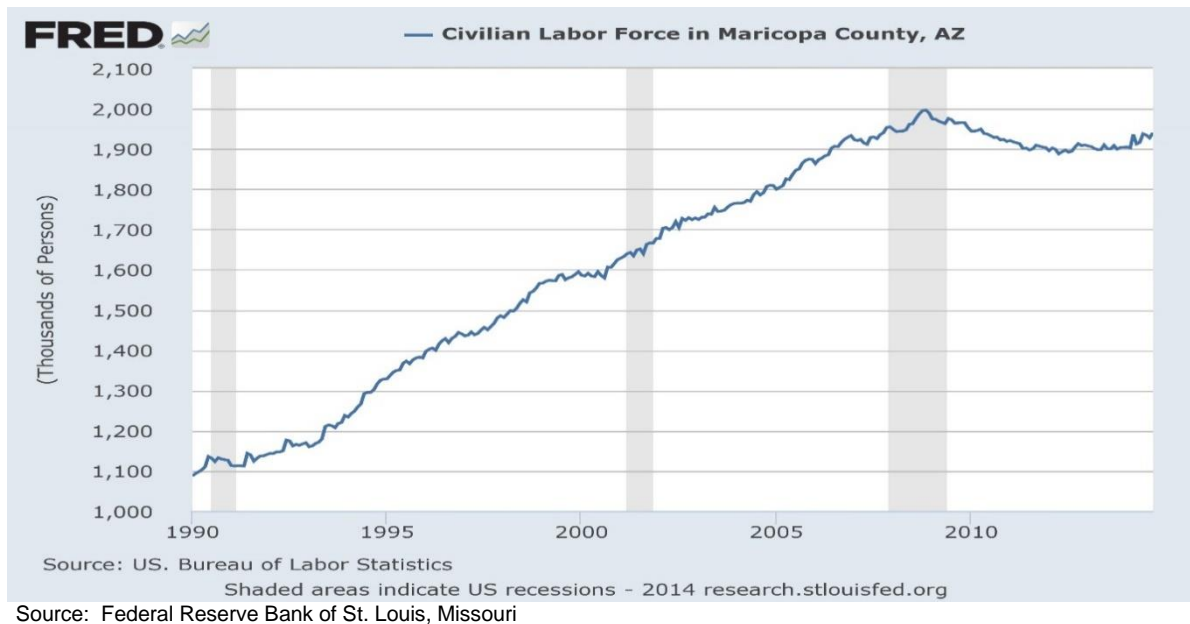
### Employment

As of 2013, the Glendale population aged 16 years and over numbered 178,121 persons, of which approximately 65.3% (116,299) were in the labor force and 57.9% (103,082) were employed. This reflects some change since 2000 when Glendale had 159,700 persons aged 16 and over. In 2000, 69.4% (110,824) of those persons were in the labor force and 64.8% (103,474) were employed.

Figure 3 gives a larger view of the labor force changes within Maricopa County, Arizona, from January 1990 to September 2014.

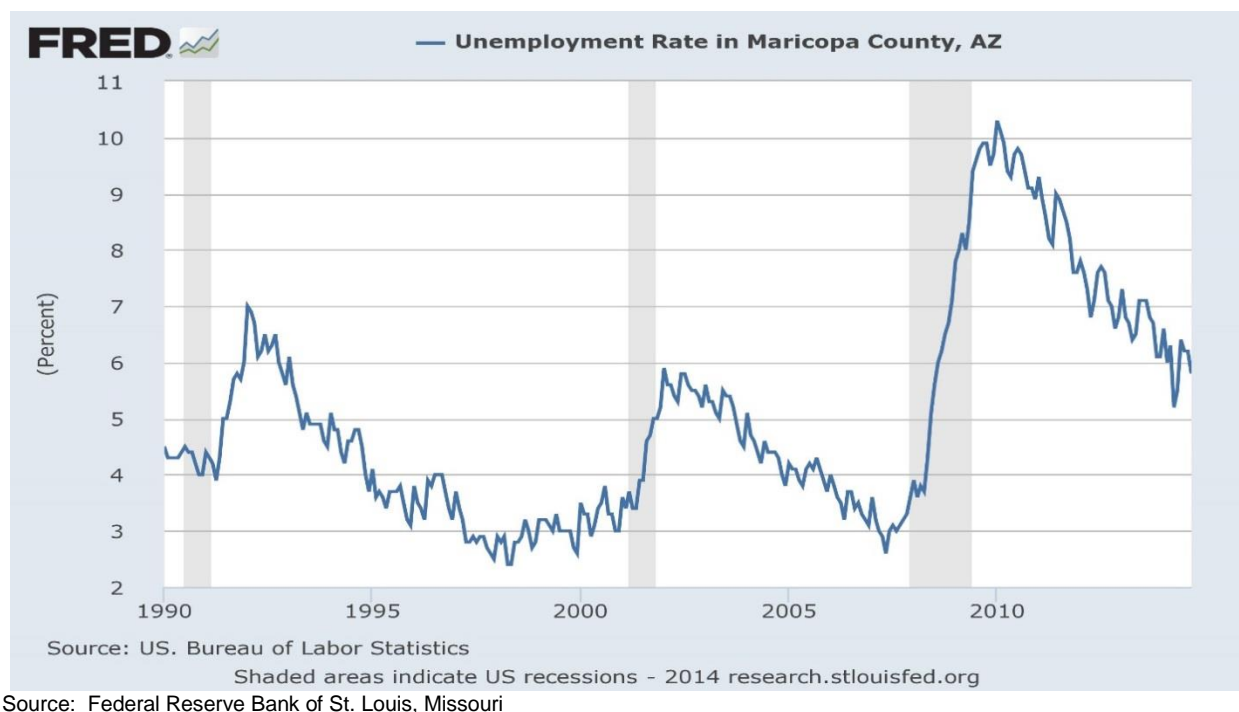
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Figure 3. Civilian Labor Force: 1990-2014 - Glendale AZ



The national economic downturn in recent years has affected the Glendale area, and unemployment in Glendale rose from 2.9% in April 2007 to 10.3% in January 2010. Further illustration of these regional trends can be found Figure 4.

Figure 4. Unemployment Rate: 1990-2014 - Glendale, AZ





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The City of Glendale has job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2013 ACS, the following six top industries provide employment for 72.2% of the City's civilian workforce:

Education, Healthcare, and Social Assistance_____	21,596 (21.0%)
Retail Trade _____	14,748 (14.3%)
Professional, scientific, and management, and administrative and waste management services _____	11,738 (11.4%)
Finance and insurance, real estate _____	9,487 (9.2%)
Arts, entertainment, recreation, and accommodation and food services _____	9,121 (8.8%)
Construction _____	7,738 (7.5%)

The top employer in Glendale is Luke Air Force Base followed by the top private employer, Banner Health System. The following table lists the major employers within Glendale.

*Table 10. Top Employers - Glendale, AZ*

Organization	Employees	Description
<b>Private Employers</b>		
<b>Banner Health System</b>	2866	General medical and surgical hospitals
<b>Wal-Mart - 6 locations</b>	2175 (FT & PT)	Department stores
<b>AAA</b>	1325	Auto services administrative office
<b>Arrowhead Hospital</b>	959	Health Services
<b>Honeywell</b>	800	Satellite and Space Systems Mfg.
<b>Humana Healthcare</b>	630	Healthcare
<b>Ace Building Maintenance Co</b>	600	Building and office cleaning services
<b>Midwestern University</b>	600	Educational Institution
<b>Bechtel Corporation</b>	500	Administrative Office
<b>Sanderson Ford, Inc.</b>	500	New and used car dealers
<b>Corning Gilbert Engineering Co., Inc.</b>	400	Electrical equipment and supplies
<b>Friendship Retirement Corp/Glencroft Care Center</b>	345	General medical and surgical hospitals
<b>Thunderbird School of Global Management</b>	300	Colleges and universities
<b>Conair Corporation</b>	400	Consumer Products
<b>Cabela's</b>	308 (FT & PT)	Outdoor outfitters retail store
<b>Life Care Center of North Glendale</b>	300	Medical/Long term care
<b>Precision Research</b>	285	Marketing Research office
<b>Palo Verde Plastering Inc.,</b>	280	Plaster and drywall work
<b>S C P Construction</b>	275	Concrete work
<b>Sands Motor Company</b>	270	New and used car dealers
<b>Ranch Market</b>	253	Grocery Store
<b>Costco Wholesale</b>	250	Department stores
<b>WINCO</b>	250	Grocery Store

Organization	Employees Public Employers	Description
<b>US Air Force - Luke AFB</b>	6325	F-16 training base
<b>GU High School Dist. #205</b>	2008	Elementary and secondary schools
<b>GE School District #40</b>	1684	Elementary and secondary schools
<b>DVUSD #97</b>	1432	Elementary and secondary schools
<b>City of Glendale</b>	1132	General government
<b>Glendale Community College</b>	2000 (FT & PT)	Colleges and universities
<b>United States Postal Service</b>	387	3 branches - post offices

Source: City of Glendale Office of Economic Development

## Transportation and Commuting

### Transportation

Valley Metro is the regional transit agency serving the Greater Phoenix Metro Area. The transit agency began in March 2012 and is comprised of the Regional Public Transportation Authority (RPTA) and Valley Metro Rail. The RPTA is a Valley-wide transit system that was created in 1993. The system serves Avondale, Buckeye, Chandler, El Mirage, Gilbert, Glendale, Goodyear, Maricopa County, Mesa, Peoria, Phoenix, Scottsdale, Surprise, Tempe, Tolleson, and Wickenburg. Valley Metro Rail was created in 2002 and operates a 57-mile high-capacity transit system in the cities of Phoenix, Tempe, Mesa, Glendale, and Chandler.

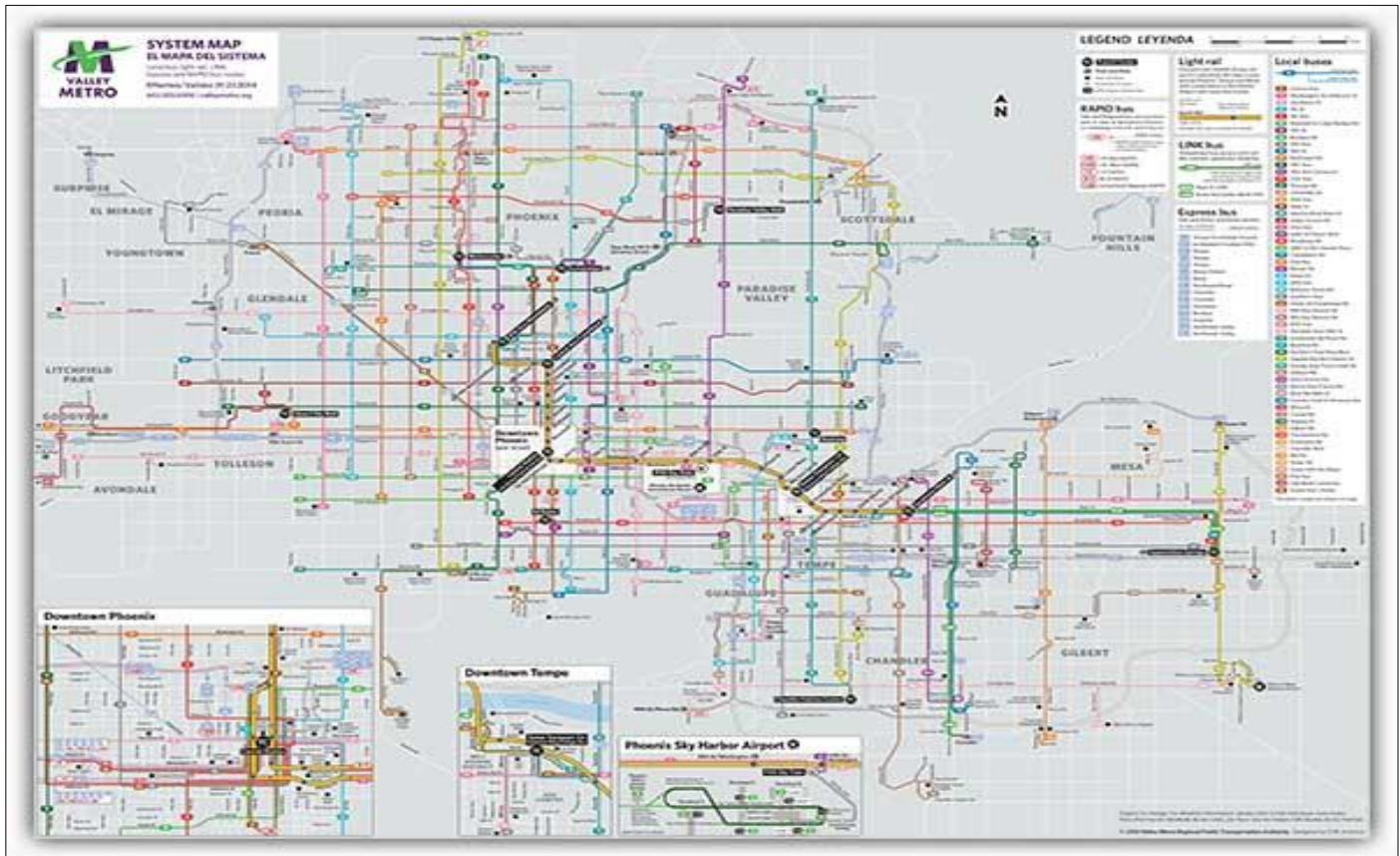
The Valley Metro services include local, LINK, express and RAPID commuter bus service, light rail, neighborhood commuters, and rural routes. There are 59 local routes, 21 Express and 5 RAPID routes, 2 LINK routes, 18 circulators, and 1 rural route. All of the bus, rail, and Dial-A-Ride vehicles are wheelchair accessible. According to a report in Operations Statistics between July 1, 2012-June 30, 2013, the bus service area covered 507 sq. miles and 50% of the population in the service area lived within ¼ mile of a bus route. The fare structure for the local bus/LINK/Light Rail is as follows:

- One-Way transit fare is \$2.00
- All-Day pass is \$4.00
- All-Day pass on board bus is \$6.00
- 7-Day pass is \$20.00
- 15-Day pass is \$33.00
- 31-Day pass is \$64.00

An additional \$1.25 over the local full fare is required to ride the Express/RAPID routes. Persons with a disability, seniors age 65 and older, Medicare cardholders and youth ages 6 through 18, qualify for reduced fares on local bus and light rail.

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Figure 5. Valley Metro Transit System Map



The City provides several lower-cost transit services in addition to the traditional fixed-route bus service. The alternative transit services are Dial-A-Ride, the Glendale Urban Shuttle (GUS), the Taxi Subsidy Program, and ADA Reservation Services.

Dial-A-Ride is a service offered seven days a week. Weekend and holiday service is provided by reservation only. The fare for regular riders (14-64 years of age) is \$2. Senior, persons with disabilities, and children between the ages of 6 and 13 ride at a reduced fare of \$1. Children younger than 5 years ride free. Dial-A-Ride buses are wheelchair lift equipped.

The Glendale Urban Shuttle (GUS) operates two routes and travels to major destinations within the City. The fare is \$0.25 with a reduced fare of \$0.10 for seniors, persons with disabilities, and Medicare card holders. GUS travels to the following destinations:

- Northern Crossing
- Ceretta Candy Factory
- Maricopa County Clinic
- Glendale City Hall
- Maricopa County Superior Court Complex
- Glendale High School
- Shops in Downtown Glendale
- Velma Teague Library/Murphy Park

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- NBA Lifestyles
- Manistee Manor
- Waymark Gardens
- 59th and Peoria Avenues
- Glencroft Retirement Villas
- Glendale Adult Center
- Glendale Main Library
- Northern Crossing
- Glendale Community College

The City also operates a Taxi Subsidy Program for persons with special transportation needs. Residents may utilize this service for trips for medical treatments and therapies. In order to participate in the program, residents must have a qualifying physician order for repetitive medical treatments and therapies such as dialysis, cancer treatments, and therapy following a stroke. The City pays 75% the one-way taxi fare, up to \$15 per, and residents pay the remaining 25%. The City also pays 15% for gratuity, up to \$2.50 per trip.

The ADA Reservation Services is provided for persons with disabilities who are unable to use the Valley Metro fixed-route bus services because of a disability. The ADA Reservation Service operates on the same routes and hours as the Valley Metro fixed-route bus service. The service operates within  $\frac{3}{4}$  of a mile to established fixed-route bus. The fare to use this service is \$2 for an ADA Eligible rider and for a companion. ADA attendants who provide personal care to the eligible rider ride at no charge.

The goals and objectives of Valley Metro include increasing the availability of public transportation, establishing Transit-Oriented Development (TOD) principles in the planning and development process, and supporting community focused development. The cities of Phoenix, Tempe, and Mesa have already taken actions to encourage development near the existing light rail system. Valley Metro is tasked with assisting member cities in developing policy and implementation strategies to build support to TOD projects that: (1) improve access to public transportation, (2) make communities more pedestrian and bicycle friendly, and (3) create new living spaces that better serve the daily activities of the region by interfacing with a more diversified set of mobility options.

While the public transportation services available to the region seem quite extensive, the City of Glendale's 2015-2019 Consolidated Plan identified transportation services as a medium to high priority. In focus groups meetings conducted during the development of the AI, participants stated that current transportation schedules were not extensive and there were issues accessing public transportation at late hours from employment sites.

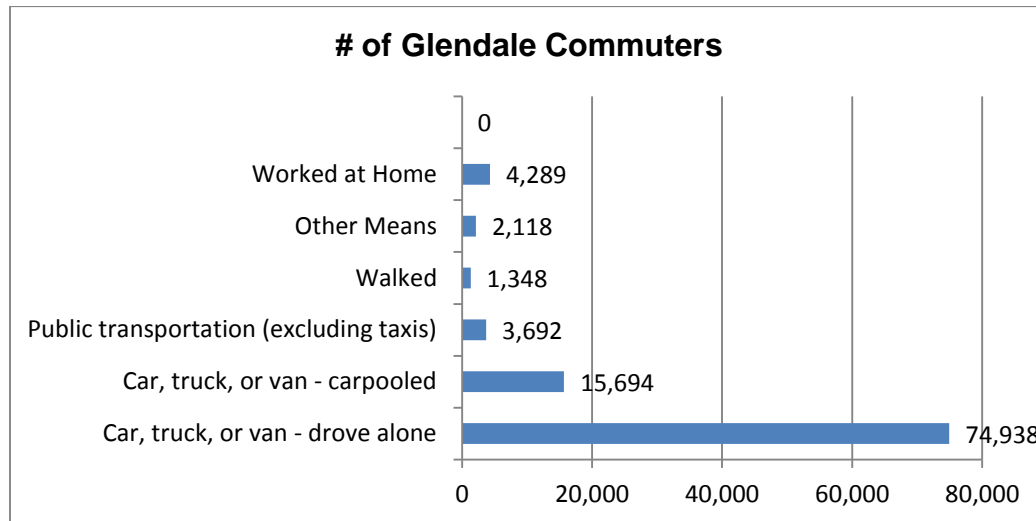
Generally, public transportation is used by lower income persons, persons who are elderly, and persons with disabilities; thus these are the groups disproportionately impacted by insufficient public transportation. The siting of public transportation has an impact on fair housing choice. The failure to provide transportation or affordable housing in proximity to job centers is a barrier to low- and moderate-income people impacting their ability to secure employment. The lack of public transportation also affects where people are able to attend school, shop, and conduct their business. The areas where public transportation is not available, or does not connect residents with employment or their other needs makes the area inaccessible to those without means to have a personal vehicle.

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## Commuting

According to the 2013 ACS, 73.4% of Glendale workers drove to work alone and 15.4% carpooled. Among those who commuted to work, it took them on average 27 minutes to get to work.

*Figure 6. Modes of Transportation - Glendale, AZ*



Source: U.S. Census, 2009-2013 ACS 3-Year Estimate

*Table 11. Commute Times - Glendale, AZ*

Travel Time to Work (one way)	Commuters	Rate (%)
Less than 10 minutes	9,024	9.2%
10 to 14 minutes	10,501	10.7%
15 to 19 minutes	13,632	13.9%
20 to 24 minutes	17,319	17.7%
25 to 29 minutes	7,824	8.0%
30 to 34 minutes	16,792	17.2%
35 to 44 minutes	8,226	8.4%
45 to 59 minutes	7,201	7.4%
60 or more minutes	7,271	7.4%

Source: U.S. Census, 2009-2013 ACS 3-Year Estimate

A review of the data in Table 11 above, shows that approximately 20% of commuters spent less than 15 minutes commuting one way to work. An additional 39.6% spent less than 30 minutes commuting one way to work. The largest group of commuters (17.7% of all commuters) spent less than 25 minutes commuting one way to work.



### III. HOUSING PROFILE

#### Housing by Tenure

According to the CHAS, the City of Glendale's population grew 5% from 2000 (218,791) to 2011 (229,611). The 2010 Census Demographic Profile Data for Glendale reported 90,505 housing units of which 79,114 (87.4%) were occupied housing units, and 11,391 (12.6%) were vacant. Of the occupied housing units 58.6% were owner-occupied and 41.4% were renter occupied. Of the vacant housing units, 6,598 (7.3%) were vacant for rent, 1,727 (1.9%) were for sale, 159 (0.2%) were rented not occupied, 274 (0.3%) were sold not occupied, 559 (0.6%) were seasonal, and 2,074 (2.3%) were all other vacant. Information from Zillow website as of December 2013, shows there were 25 units for sale and 22 units for rent in Glendale, and one foreclosed property coming to the market within the year.

As reported by HUD in the Consolidated Plan data, table 12 below, the 2007-2011 ACS (5-Year estimate) has a slightly lower number of total units at 90,349.

*Table 12. Unit Size by Tenure - Glendale, AZ*

	Owners		Renters	
	Number	%	Number	%
No bedroom	105	0%	1,666	5%
1 bedroom	529	1%	9,193	30%
2 bedrooms	5,854	12%	10,470	34%
3 or more bedrooms	42,182	87%	9,711	31%
<b>Total</b>	<b>48,670</b>	<b>100%</b>	<b>31,040</b>	<b>100%</b>

Source: U.S. Census, 2007-2011 ACS

The predominant type of housing as noted in table 13 below is single- unit detached structures (60%), followed by structures with 5-19 units (15%) and structures with 20 or more units (10%). One-unit attached structures, mobile homes, RVs, boats, etc. are both at six percent.

*Table 13. Residential Properties by Unit Number – Glendale, AZ*

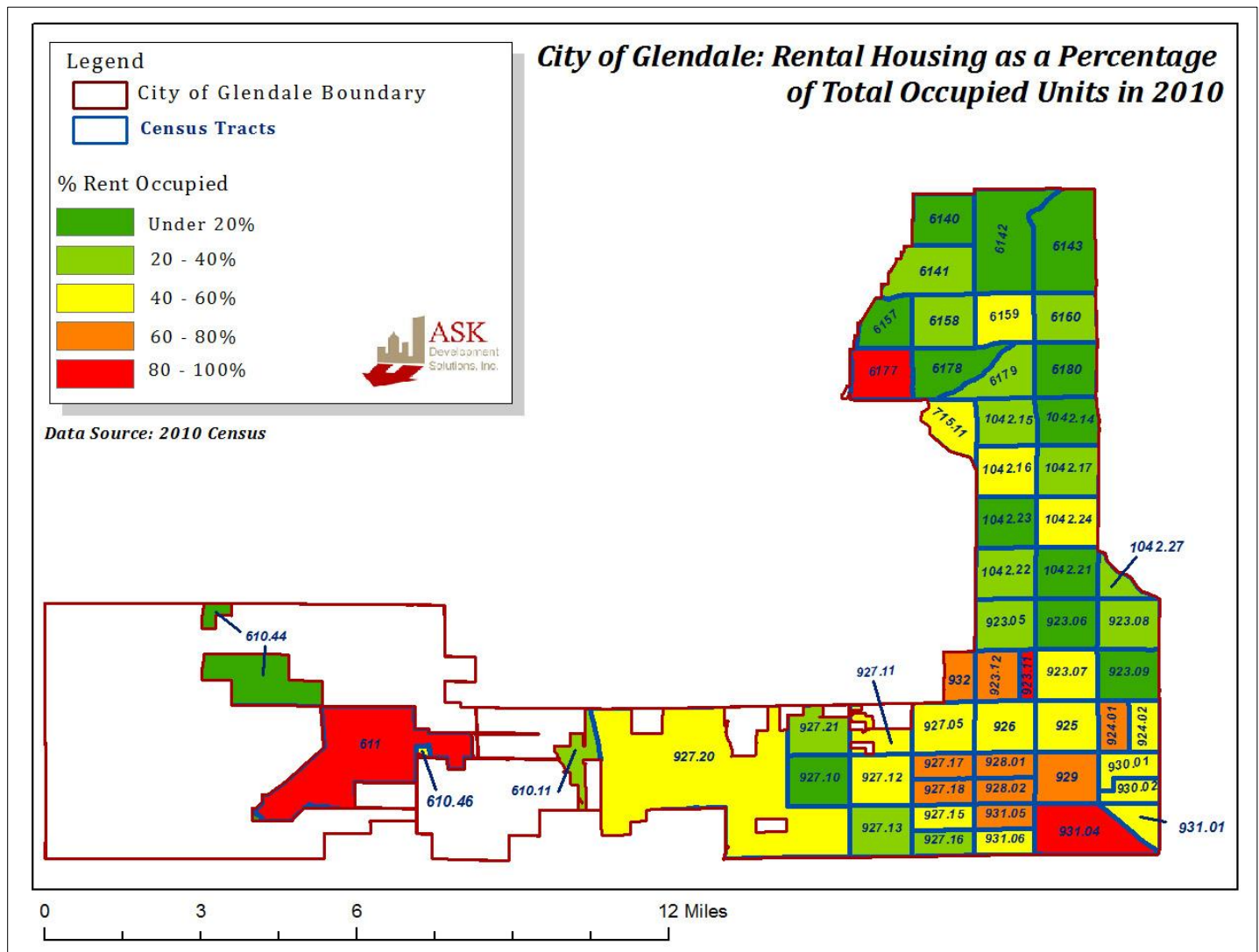
Property Type	Number	Percent (%)
1-unit detached structure	54,371	60%
1-unit, attached structure	5,015	6%
2-4 units	3,680	4%
5-19 units	13,373	15%
20 or more units	8,694	10%
Mobile Home, boat, RV, van, etc.	5,306	6%
<b>Total</b>	<b>90,439</b>	<b>100%</b>

Source: U.S. Census, 2007-2011 ACS

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The following map (9) shows the renter occupied units as a percentage of all occupied units by census tract for 2010.

*Map 9. Rental Housing as a Percentage of Total Occupied Units - Glendale, AZ*



Source: 2010 U.S. Census

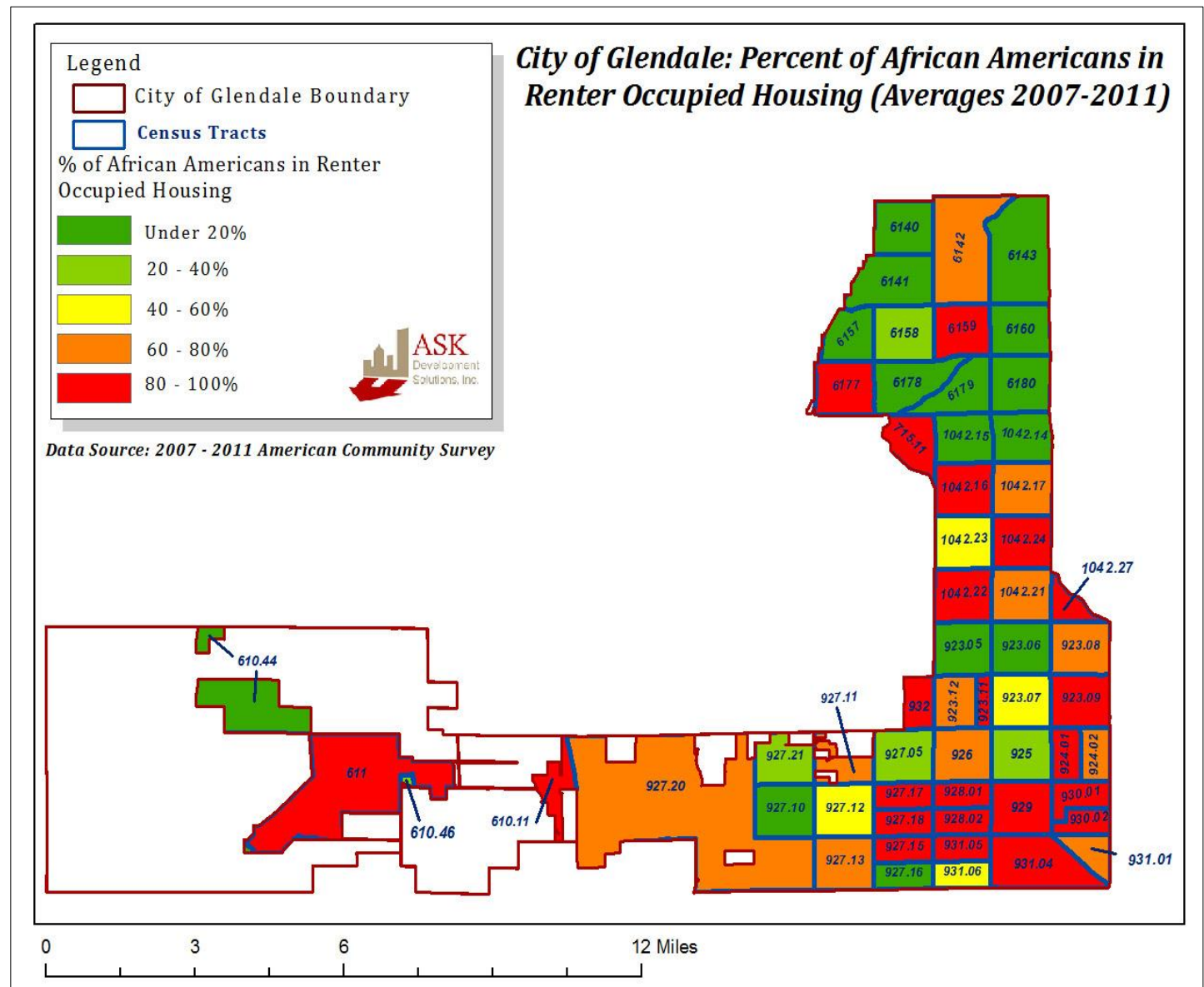
The census tracts which had the highest percentage (80-100%) of renter households were 611, 6177, 923.11, and 931.04. The census tracts with the next highest renter households were 932, 928.01, 928.02, 931.05, 927.18, 923.12, 927.17, 929, and 924.01. In cross referencing these census tracts with the percentage of African American residents, the data for the tracts with the highest renter occupants had the lowest African American residents at 5-8%. Some tracts with renter occupants of 60-80% also had African Americans at 5-8% and at higher rates of 8-15% in census tracts 931.05, 928.01, and 931.05. The only census tract that had a higher percentage of African American residents, at 15-20%, was tract number 927.17. For persons of Hispanic ethnicity, the percentage of households in renter occupied housing was highest (90-100%) in the four census tracts with higher renter occupied housing.



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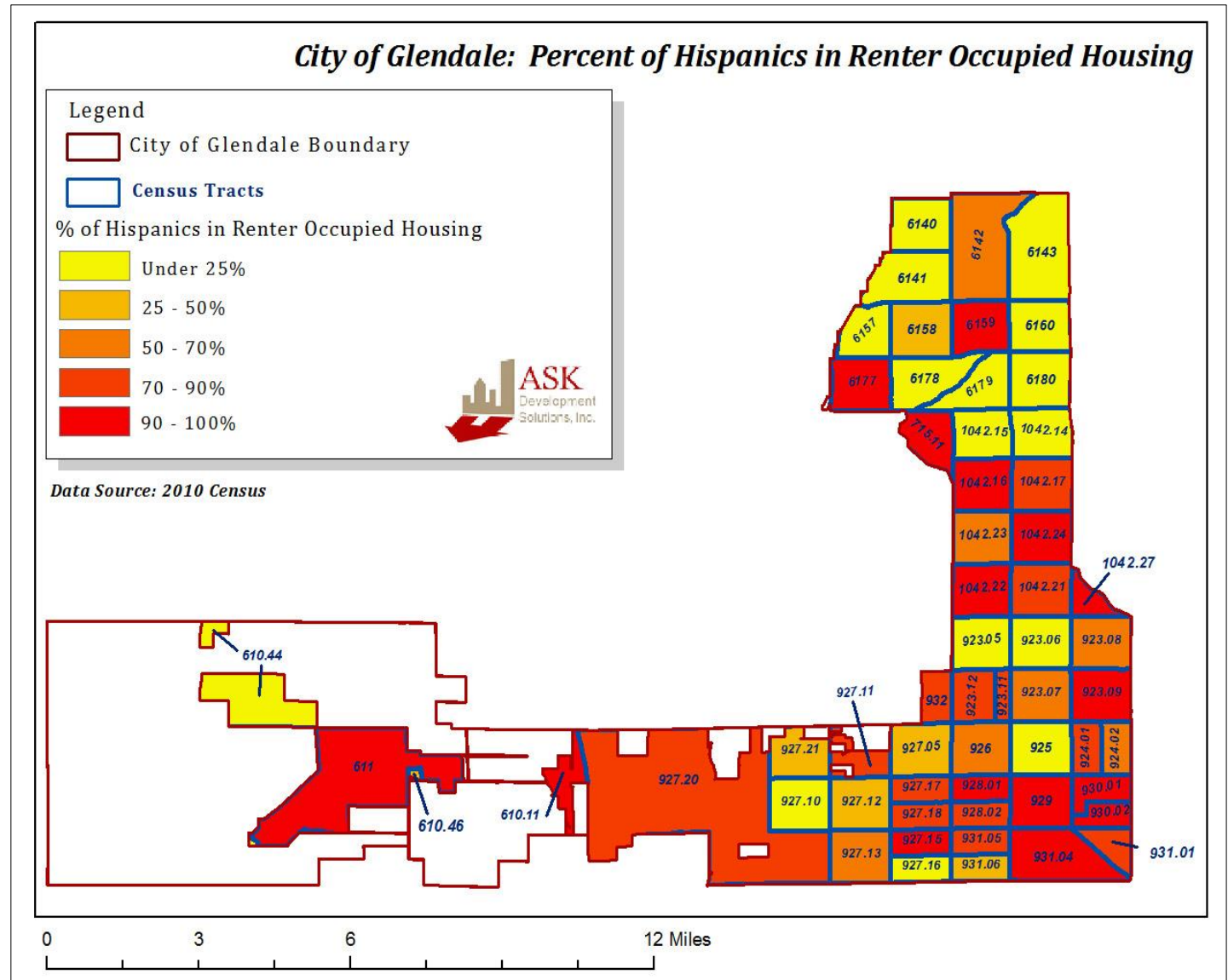
Only one of the high renter occupancy tracts shows a 50-70% Hispanic households which is still a high percentage. See maps below for comparison.

Map 10. Percent of African Americans in Renter Occupied Housing - Glendale, AZ



Source: U.S. Census, 2007-2011 ACS

Map 11. Percent of Hispanics in Renter Occupied Housing - Glendale, AZ



Source: 2010 U.S. Census

## Condition of Housing

The age of the housing stock in Glendale as shown in Table 14 is relatively young with a significant portion of the housing stock, 37.9% of units, being built after 1990, 51.1% of the structures were built between 1970 and 1989, and only 10.9% of structures were built prior to 1970. The older units, those built between the 1970s and 1980s, may be in need of repair if they were not properly maintained.

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*Table 14. Year Structure Built - Glendale, AZ*

<b>YEAR STRUCTURE BUILT</b>		
<b>Total:</b>	<b>90,818</b>	<b>100.0%</b>
<b>Built 2010 or later</b>	120	0.1%
<b>Built 2000 to 2009</b>	12,009	13.2%
<b>Built 1990 to 1999</b>	22,304	24.6%
<b>Built 1980 to 1989</b>	21,204	23.3%
<b>Built 1970 to 1979</b>	25,227	27.8%
<b>Built 1960 to 1969</b>	5,153	5.7%
<b>Built 1950 to 1959</b>	3,379	3.7%
<b>Built 1940 to 1949</b>	843	0.9%
<b>Built 1939 or earlier</b>	579	0.6%

Source: U.S. Census, 2009-2019 ACS 3-Year Estimate

### Housing Affordability

The median value of an owner-occupied housing unit in 2000 was \$118,600, compared to the 2012 median value of \$160,600, is a 35.41% increase. Using the industry standard of three times the income to afford a median priced home, a household would need to earn \$53,533 annually to affordably own a home in Glendale, based on the 2012 value.

According to the 2012 ACS, median gross rent in Glendale was \$857 monthly. This reflects an increase of \$245 (40.03%) since the 2000 Census (\$612) median gross rent. Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a 2012 household would need to earn \$34,280 annually to afford the median gross rent. Table 15 shows a comparison between Glendale and other nearby communities. Of the seven communities assessed, the City of Glendale has the lowest median rent at \$857 per month. The City of Gilbert has the highest median rent at \$1,270 per month. In terms of home value, the Cities of Glendale and Mesa have similar median home values ranging between \$160,000 and \$162,200, while Phoenix and Maricopa County median home values range from \$174,100 to \$193,900. The Cities of Chandler, Gilbert, and Scottsdale have the highest median home values at \$232,900, \$235,500 and \$396,700, respectively.

*Table 15. Median Rent and Median Home Value - Glendale, AZ*

<b>Geographic Area</b>	<b>Median Rent</b>	<b>Annual Income Required to Afford Median Rent</b>	<b>Median Home Value</b>	<b>Annual Income Required To Afford Median Home Value</b>
<b>Glendale</b>	<b>\$857</b>	<b>\$34,280</b>	<b>\$160,600</b>	<b>\$53,533</b>
Chandler	\$1,068	\$42,720	\$232,900	\$77,633
Gilbert	\$1,270	\$50,800	\$235,500	\$78,500

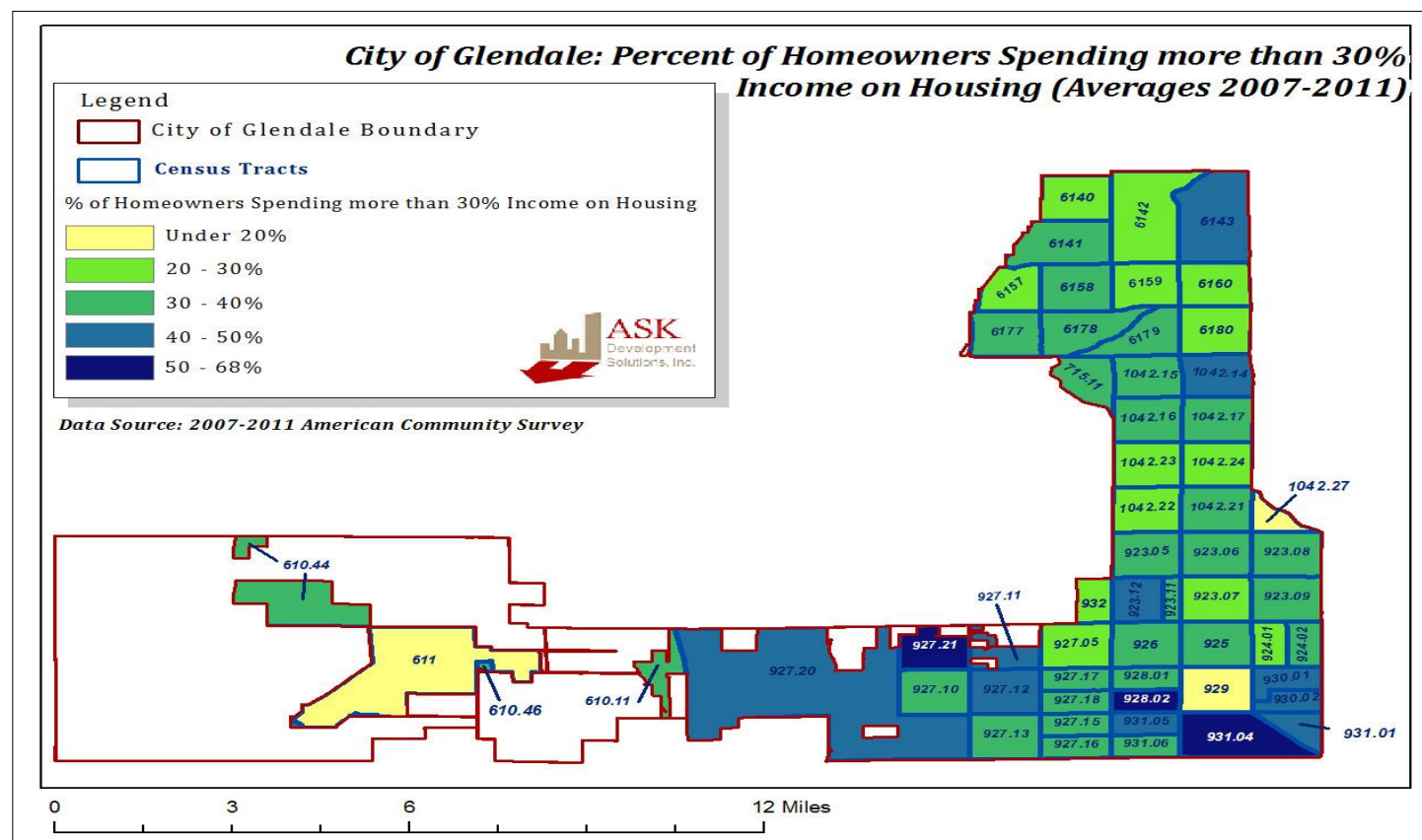
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Geographic Area	Median Rent	Annual Income Required to Afford Median Rent	Median Home Value	Annual Income Required To Afford Median Home Value
Maricopa County	\$944	\$37,760	\$193,900	\$64,633
Mesa	\$872	\$34,880	\$162,200	\$54,067
Phoenix	\$871	\$34,840	\$174,100	\$58,033
Scottsdale	\$1,127	\$45,080	\$396,700	\$132,233

Source: American Community Survey, U.S Census Bureau (2012)

- 1) Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.
- 3) According to the 2012 American Community Survey (ACS) data, Glendale has 38,056 owners with mortgages. Of these owners, 3,439 or 9.03% pay more than 30 to 34.9% of their household income on housing costs; and 10,504 or 28 pay 35% or more. Also, there are 9,224 owners without mortgages, 352 or 3.82% pay 30 to 34.9 % on housing costs; and 1,232 or 13.35% pay 35% or more on housing costs.

Map 12: Percent Homeowners Spending more than 30% Income on Housing – Glendale, AZ



Source: U.S. Census, 2007-2011 ACS

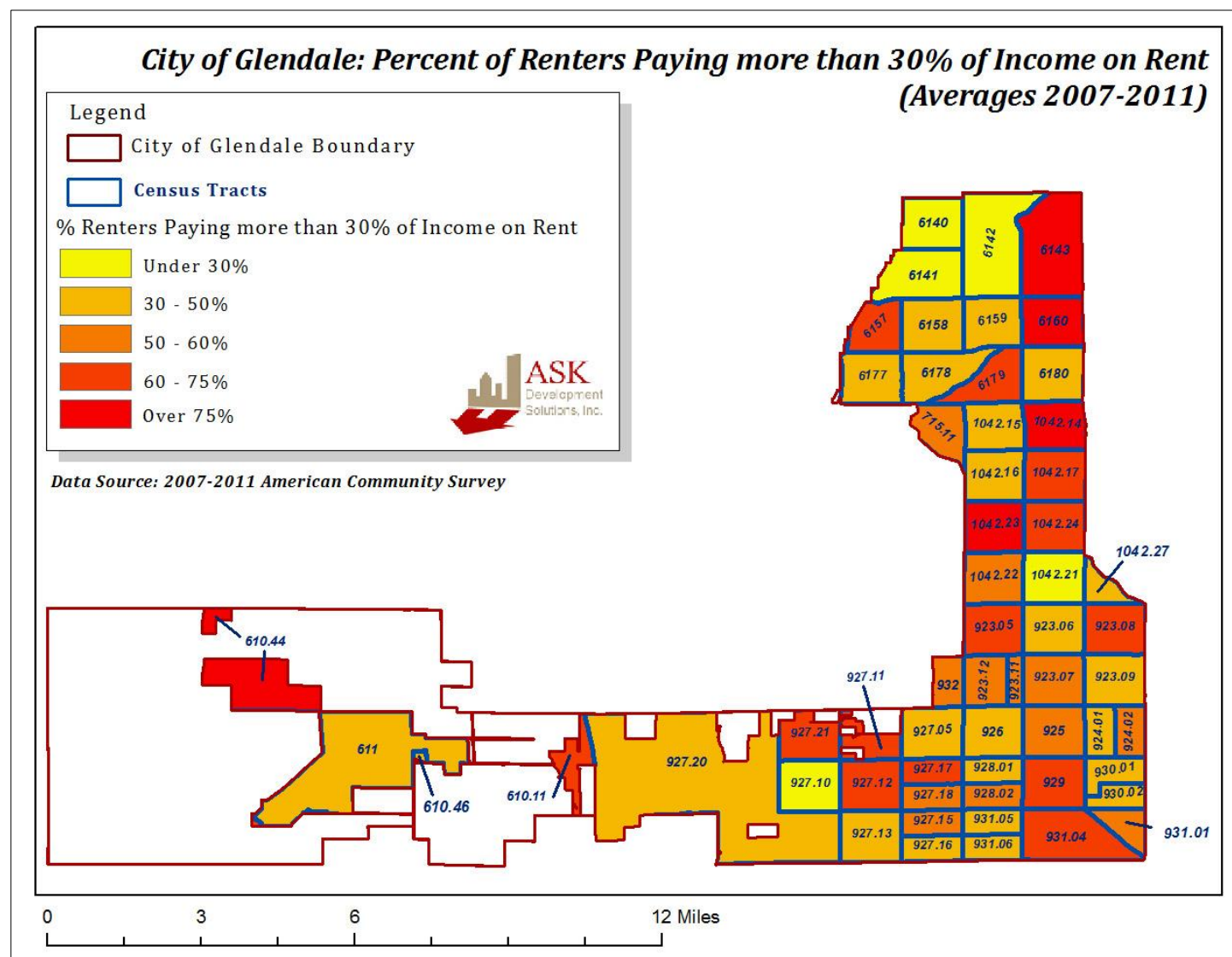


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There are 30,864 renter-occupied households and 16,664 or 54 % pay 30% or more of their household income on rental housing costs monthly; of this number 2,885 or 9.35% pay 30 to 34.9% of their income on rental housing costs. Another 13,779 or 45% pay 35% or more on renter housing costs.

According to RealtyTrac, the median sales price for a home in Glendale in September 2014 was \$165,000. Based on household income reported in the 2012 ACS, an estimated 43.3% of Glendale owners (20,472 households) and 10% of renters (3,178 households) could afford to purchase the median-priced home without cost burden.

*Map 13. Percent of Renters Paying more than 30% Income on Rent - Glendale, AZ*



Source: U.S. Census, 2007-2011 ACS

In regards to affordability of rental units, Table 16 provides the FY 2014 Fair Market Rents (FMR) for Maricopa County. Rents ranged from \$614 for an efficiency unit to \$1,647 for a four-bedroom unit. Approximately 61% of renters (18,747 households) can afford to rent an efficiency unit, 45% of renters

(13,822 households) can afford to rent a two-bedroom unit, and 5% of renters (1,398 households) can afford to rent a four-bedroom unit.

*Table 16: FY 2014 Fair Market Rents by Unit Bedrooms – Maricopa County, AZ*

Final FY 2014 FMRs By Unit Bedrooms				
Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
\$614	\$774	\$957	\$1,410	\$1,647

### Comprehensive Housing Affordability Study (CHAS)

As an additional measure of determining housing affordability and its impact on members of the protected classes, the AI uses HUD's Comprehensive Housing Affordability Study (CHAS) to gauge housing affordability, or lack thereof. It should be noted here that lack of affordability is not an impediment in itself because income is not a protected class. However, census and HUD CHAS data shows that lack of affordability often has the potential to disparately impact some members of the protected classes.

In using CHAS data to assess housing affordability, the following definitions are used:

**Cost Burdened:** HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction. Generally, for renters, housing costs include rent and utilities; and for owners, housing costs include mortgage payments, taxes, insurance, and utilities.

**Severe Cost Burdened:** In the situation where the household expends greater than 50% of its income on housing cost, the household is considered **severely** cost burdened.

**Housing Problems:** According to HUD, a household with housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.01 persons/room); or
4. Cost burdened (paying more than 30% of income for housing, including utilities).

**Severe Housing Problems:** According to HUD, a household with severe housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.5 persons/room); or



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4. Cost burdened (paying more than 50% of income for housing, including utilities).

**Disproportionately Greater Housing Need:** According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

**Income Categories:** Data on the following income groups were assessed for the AI:

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: greater than 30%-50% of the AMI
- Moderate Income: greater than 50%-80% of the AMI
- Middle and Upper Income: greater than 80% or more of the AMI

**Number of Households**

According to the City of Glendale's Consolidated Plan for FY 2015-2019, there were a total of 79,710 households in the City. Of this total, 31,580 or 39.6% were considered to be low- and moderate- income households, with 15.9% being moderate income, 11.9% being low income, and 11.8% being extremely low income households. The CHAS reveals that the households in the extremely low income category are the highest percentage experiencing at least one housing problem, as defined by HUD.

*Table 17. Number of Households - Glendale, AZ*

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households *	9,400	9,515	12,665	8,140	39,985
Small Family Households *	3,320	3,185	5,600	3,490	22,760
Large Family Households *	1,335	1,435	1,385	1,385	4,070
Household contains at least one person 62-74 years of age	1,030	1,475	1,680	1,280	6,295
Household contains at least one person age 75 or older	985	1,390	1,170	665	1,620
Households with one or more children 6 years old or younger *	2,675	2,560	3,120	1,570	4,984

\* the highest income category for these family types is >80% HAMFI

Source: U.S. Census, 2007-2011 ACS

According to the 2007-11 CHAS, the most common housing problem for the City of Glendale is cost burden and severe cost burden faced by both renters and owners. Of the total renter households in the 0-80% income category, 73% are cost burdened and 42% are severely cost burdened. Of the total owner households in the same income category, 68% are cost burdened and 42.3% are severely cost burdened.

According to the 2007-11 ACS, 24.1% of the estimated 79,710 City of Glendale households are living alone, of which 6.1% are 65 years and over. CHAS 2007-11 data shows that 35% Other Household renters in the 0-80% AMI category were cost burdened. In the same income category, 35% Other

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Household renters were severely cost burdened. These categories of households generally constitute single person households.

*Table 18. Housing Needs Summary - Glendale, AZ*

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	190	170	105	60	525	40	0	35	45	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	315	180	330	135	960	45	25	65	60	195
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	680	660	485	260	2,085	125	280	205	30	640
Housing cost burden greater than 50% of income (and none of the above problems)	4,320	2,180	575	35	7,110	1,630	1,570	1,780	450	5,430

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	255	2,155	2,750	715	5,875	310	805	1,840	1,565	4,520
Zero/negative Income (and none of the above problems)	480	0	0	0	480	185	0	0	0	185

Source: U.S. Census, 2007-2011 ACS

2. Housing Problems 2 (Households with one or more Severe Housing Problems)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,505	3,190	1,495	490	10,680	1,840	1,875	2,085	590	6,390
Having none of four housing problems	965	2,740	5,040	2,955	11,700	415	1,710	4,055	4,100	10,280
Household has negative income, but none of the other housing problems	480	0	0	0	480	185	0	0	0	185

Source: U.S. Census, 2007-2011 ACS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,090	1,819	1,775	5,684	685	919	1,735	3,339
Large Related	830	690	225	1,745	270	425	420	1,115

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	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	675	900	314	1,889	600	825	690	2,115
Other	1,985	1,770	1,265	5,020	515	395	860	1,770
Total need by income	5,580	5,179	3,579	14,338	2,070	2,564	3,705	8,339

Source: U.S. Census, 2007-2011 ACS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,980	740	260	2,980	640	690	925	2,255
Large Related	770	295	20	1,085	270	215	85	570
Elderly	635	460	140	1,235	470	370	365	1,205
Other	1,805	880	175	2,860	380	340	400	1,120
Total need by income	5,190	2,375	595	8,160	1,760	1,615	1,775	5,150

Source: U.S. Census, 2007-2011 ACS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	870	755	655	335	2,615	140	240	145	80	605
Multiple, unrelated family households	115	80	95	100	390	30	65	145	30	270
Other, non-family households	10	10	60	10	90	0	0	0	0	0
Total need by income	995	845	810	445	3,095	170	305	290	110	875

Source: U.S. Census, 2007-2011 ACS

The households types more affected than others by cost burden and severe cost burden are as follows:

Cost Burden

*Renter.* 39% Small Related and 35% "Other" households in the 0-80% AMI are affected by cost burden, with all income categories in both household types almost equally affected.

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*Owner:* 40% Small Related households in the 0-80% AMI are affected by cost burden, with those in the >50-80% AMI more impacted.

**Severe Cost Burden**

*Renter:* 37% Small Related and 35% Other households in the 0-80% AMI are affected by severe cost burden with those in the 0-30% AMI income category for both household types more impacted.

*Owner:* 44% Small Related households in the 0-80% AMI are affected by severe cost burden, with those in the >50-80% AMI more impacted.

**Disproportionately Greater Need: Housing Problems**

In this section, the AI will assess the need of any racial or ethnic group that has a disproportionately greater housing need in comparison to the needs of that category of need as a whole.

*Table 19. Disproportionally Greater Need 0-30% AMI - Glendale, AZ*

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	8,380	835	595	85.4
White	4,585	425	215	87.8
Black / African American	720	90	15	87.3
Asian	170	25	85	60.7
American Indian, Alaska Native	115	10	35	71.9
Pacific Islander	0	0	0	0
Hispanic	2,675	285	225	83.9

Source: U.S. Census, 2007-2011 ACS

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*Table 20. Disproportionally Greater Need 30-50% AMI - Glendale, AZ*

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	7,905	2,045	0	79.4
White	3,650	1,165	0	75.8
Black / African American	555	130	0	81.0
Asian	210	24	0	89.7
American Indian, Alaska Native	180	45	0	80.0
Pacific Islander	15	20	0	42.9
Hispanic	3,175	615	0	83.8

Source: U.S. Census, 2007-2011 ACS

*Table 21. Disproportionally Greater Need 50-80% AMI - Glendale, AZ*

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	8,225	6,335	0	56.5
White	4,550	3,150	0	59.1
Black / African American	430	430	0	50.0
Asian	280	215	0	56.6
American Indian, Alaska Native	155	110	0	58.5
Pacific Islander	0	30	0	0
Hispanic	2,710	2,355	0	53.5

Source: U.S. Census, 2007-2011 ACS



*Table 22. Disproportionally Greater Need 80-100% AMI - Glendale, AZ*

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	3,500	5,705	0	38.0
White	1,980	3,730	0	34.7
Black / African American	165	305	0	35.2
Asian	170	135	0	55.7
American Indian, Alaska Native	20	80	0	20.0
Pacific Islander	0	15	0	0
Hispanic	1,170	1,245	0	48.4

Source: U.S. Census, 2007-2011 ACS

According to the 2010 Census Profile of General Population, Glendale had a population of 226,721. The racial makeup of the community was primarily White at 67.8%, Black at 6%, American Indian and Alaska Native at 1.7%, Asian at 3.9%, Native Hawaiian and Other Pacific Islander at 0.2%. Of the total, 35.5% are of Hispanic or Latino of any race.

Analysis of the 2007-2011 CHAS data for Glendale indicates that several racial or ethnic groups are experiencing *housing problems* at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- Asians in the 0-30% AMI, 30-50% AMI, and 80-100%AMI;
- American Indians, Alaska Natives in the 0-30% AMI, and 80-100% AMI;
- Pacific Islanders in the 30-50% AMI;
- Hispanics in the 80-100% AMI

### **Disproportionately Greater Need: Severe Housing Problems**

In this section, the AI will assess the need of any racial or ethnic group that has a disproportionately severe housing problems as defined above in comparison to the needs of that category of need as a whole.

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*Table 23. Severe Housing Problems 0-30% AMI - Glendale, AZ*

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>	<b>Percent %</b>
Jurisdiction as a whole	7,500	1,715	595	76.5
White	4,065	945	215	77.8
Black / African American	645	165	15	78.2
Asian	170	25	85	60.7
American Indian, Alaska Native	95	30	35	59.4
Pacific Islander	0	0	0	0
Hispanic	2,420	540	225	75.9

Source: U.S. Census, 2007-2011 ACS

*Table 24. Severe Housing Problems 30-50% AMI - Glendale, AZ*

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>	<b>Percent %</b>
Jurisdiction as a whole	4,665	5,285	0	46.9
White	2,020	2,790	0	42.0
Black / African American	325	365	0	47.0
Asian	155	80	0	65.9
American Indian, Alaska Native	50	170	0	22.7
Pacific Islander	15	20	0	42.9
Hispanic	2,030	1,765	0	53.5

Source: U.S. Census, 2007-2011 ACS

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*Table 25. Severe Housing Problems 50-80% AMI – Glendale, AZ*

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>	<b>Percent %</b>
Jurisdiction as a whole	3,005	11,555	0	20.6
White	1,405	6,300	0	18.2
Black / African American	135	720	0	15.8
Asian	100	390	0	20.4
American Indian, Alaska Native	70	195	0	26.4
Pacific Islander	0	30	0	0
Hispanic	1,250	3,815	0	24.7

Source: U.S. Census, 2007-2011 ACS

*Table 26. Severe Housing Problems 80-100% AMI - Glendale, AZ*

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>	<b>Percent %</b>
Jurisdiction as a whole	1,070	8,140	0	11.6
White	455	5,260	0	7.9
Black / African American	55	420	0	11.6
Asian	50	255	0	16.4
American Indian, Alaska Native	0	95	0	0
Pacific Islander	0	15	0	0
Hispanic	515	1,900	0	21.3

Source: U.S. Census, 2007-2011 ACS

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Analysis of the 2007-2011 CHAS data for Glendale, indicates that several racial or ethnic groups are experiencing *severe housing problems* as defined above at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- Asians in the 0-30% AMI, and 30-50% AMI;
- American Indians, Alaska Natives in the 0-30% AMI, and 30-50% AMI

## Disproportionately Greater Need: Housing Cost Burdens

Regarding the disproportionately greater needs in the area of housing cost burdens, analysis of the 2007-2011 CHAS data for Glendale, indicates that none of the racial or ethnic groups are experiencing housing cost burdens at a disproportionate rate.

*Table 27. Disproportionately Greater Need: Housing Cost Burdens – Glendale, AZ*

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	50,310 (62.2%)	16,640 (20.6%)	13,355 (16.5%)	640
White	33,760 (65.8%)	9,750 (19%)	7,605 (14.8%)	215
Black / African American	2,015 (50.3%)	1,035 (25.8%)	940 (23.4%)	15
Asian	1,345 (57.3%)	470 (20%)	435 (18.6%)	95
American Indian, Alaska Native	480 (52.1%)	265 (28.8%)	140 (15.2%)	35
Pacific Islander	95 (86.4%)	0	15 (13.6%)	0
Hispanic	11,845 (56.2%)	4,880 (23.2%)	4,075 (19.3%)	265

Source: U.S. Census, 2007-2011 ACS

## Recap of Disparate Impact of Housing Problems

The analysis of CHAS data and the City's Consolidated Plan for 2015-2019 shows that some racial and ethnic groups are disproportionately impacted by housing problems. An overall greater incidence of households with greater housing and severe housing problems (10% higher than the total amount of all owners with housing problems) are Asian and Pacific Islanders. Hispanic ethnic groups also show a greater incidence of housing problems but not severe housing problems.

**Housing Problems:** At the 30% AMI level, Asian and American Indian/Alaskan Natives are disproportionately represented. At 50% AMI, Asian and Pacific Islanders also show a greater percentage of housing problems. At the 100% level, Asians, American Indian/Alaskans, and Hispanics show a greater percentage of housing problems.

**Severe Housing Problems:** At both the 30% and 50% AMI levels Asian and American Indian/Alaskan Natives are disproportionately represented showing a greater percentage of severe housing problems.

**Housing Cost Burdens:** None of the racial or ethnic groups are experiencing housing cost burdens at a disproportionate rate.

## **Subsidized Multi-family Affordable Housing Stock**

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly are needed. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing. The following are some of the multi-family housing types that meet the needs of low income, elderly, and persons with disabilities in the City of Glendale:

- Low-income housing tax credits (LIHTC) – The LIHTC program administered by the Arizona Housing Finance Authority provides for the development costs of low-income housing by giving a federal tax credit to investors for investing in housing for low-income households typically at 60% of the Area Median Income (AMI) and below. However, due to the rent levels, renters at 30% AMI may not be able to afford the units.
- Section 202 Supportive Housing for the Elderly – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for very low-income elderly persons.
- Section 811 Supportive Housing for Persons with Disabilities – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for persons with disabilities. The program also provides rental assistance to state housing agencies for new and existing multi-family housing developments.
- Section 8 Loan Management Set-Aside (LMSA) Program – A HUD-funded program that provides financial assistance in the form of rental subsidies to multi-family properties subject to Federal Home Administration (FHA) insured mortgage loans which are in immediate or potential financing difficulty; and thereby to reduce the volume of mortgage loan defaults as well as claims for FHA mortgage insurance benefits from private lenders holding the FHA insured mortgage loans on such projects.<sup>6</sup>
- Public Housing – A HUD-funded program that provides financial assistance to local housing agencies (HAs or PHAs) to develop and operate decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. The public housing program in Glendale is administered by the City's Community Housing Division.
- Section 8 Housing Choice Voucher Program – A HUD-funded program that provides financial assistance for the rental of housing from private landlords for eligible low-income families, the elderly, and persons with disabilities. Tenants are able to find their own housing including single-family homes, townhouses, and apartments. The section 8 voucher program in Glendale is administered by the City's Community Housing Division.

The following section provides information on housing available in the City under the above programs.

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<sup>6</sup> U.S. Department of Housing and Urban Development (HUD) website. Section 8 Program Background Information.

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/housing/mfh/rfp/s8bkinfo](http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rfp/s8bkinfo)

Accessed March 22, 2015



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Table 28. Low- Income Housing Units – Glendale, AZ

Project Name	Number of Low-Income Units	Total Units	Placed in Service Year	Unit Types	Zip Code
Galleria I and Apartments II	144	144	1990	1, 2 and 3-bedroom	85304
Las Villas Del Sol	164	180	2001	1, 2 and 3-bedroom	85303
San Martin Apartments	351	384	2003	1, 2 and 3-bedroom	85031
San Remo	258	276	2003	1, 2 and 3-bedroom	85031
Town Square Courtyard Homes	60	60	2004	2 and 3-bedroom	85031
Glendale Lofts	28	28	2010	3-bedrooms	85031
Desert Eagle	196	196		1, 2, 3 & 4-bedroom	85303
Shadow Creek II	123	184		1 and 2-bedroom	85304
Palms at Glendale	160	160	1994	1 and 2-bedroom	85301
Faith House	16	16	1999	Studio Apts.	85302
Total	1,500	1,628			

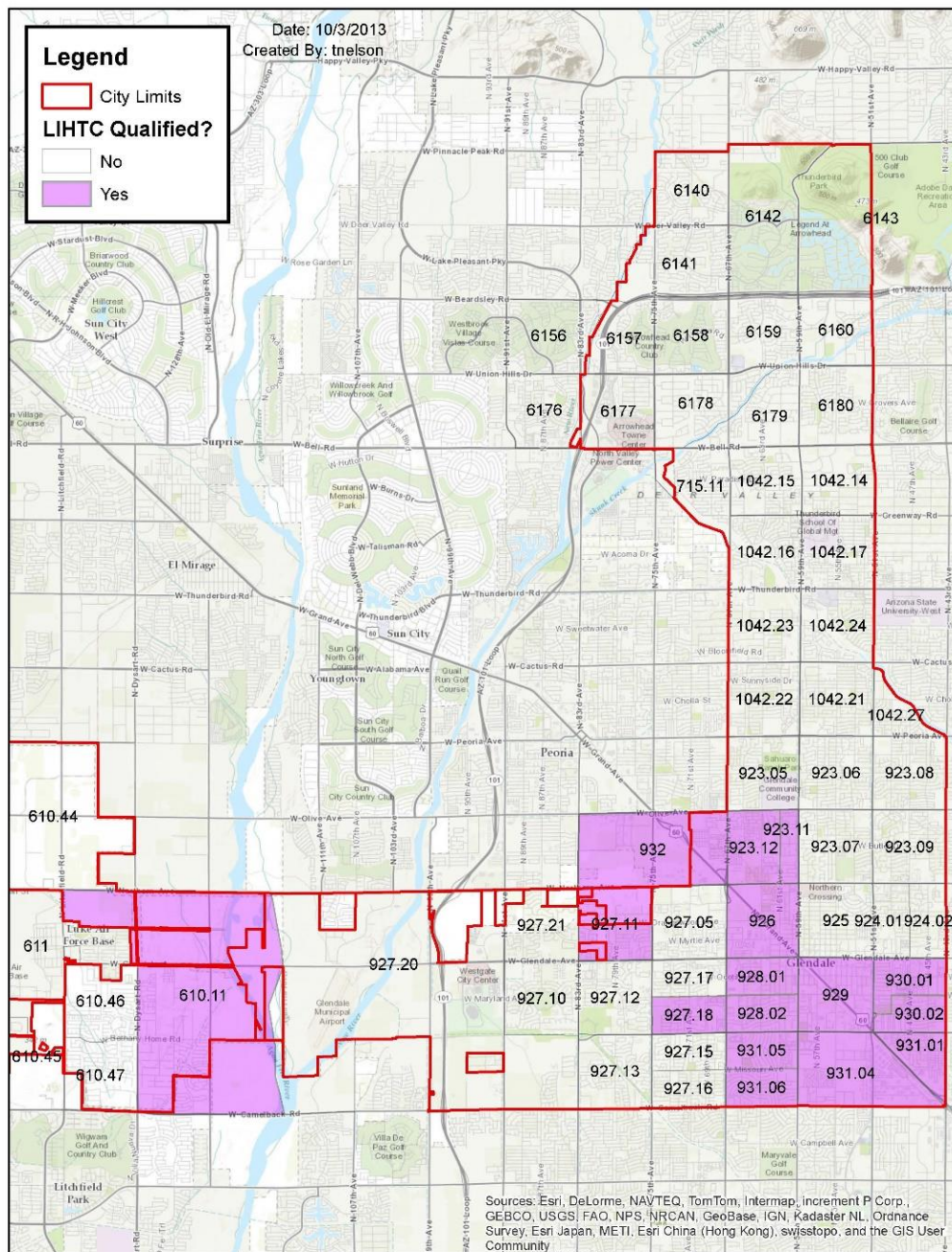
Source: U.S. HUD

It is important, in assessing fair housing choice, to look at concentration of affordable housing. The location of the low-income housing units are distributed across the City. Most of the units are in zip code 85031. The Maricopa County 2015 Draft AI noted that the City of Glendale has the highest percentage of racial and ethnic minority concentrated areas in cities within the region. The City of Glendale does not provide financial assistance to rental projects. For affordable homeownership units assisted by the City, every effort is made to ensure geographic distribution of units in a manner that does not concentrate affordable housing.

For LIHTC housing units, additional points are provided for housing that is being developed in LIHTC Qualified Areas. Based on GIS maps provided by the City, Low- Income Housing Tax Credit (LIHTC) Qualified Areas are located on the south west side and southeast areas of the City. Per Map #14, the LIHTC qualified area on the west side of the City is located in census tract 610.11 which is a middle-income census tract. Other LIHTC qualified areas on the east side of the City includes both low- income and moderate- income census tracts. The geographic distribution of affordable housing is affected by factors such as the LIHTC scoring as noted above, but other considerations are used by private developers including the cost of land, nearness to transportation corridors, and often nearness to the target populations.

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Map 14. Low Income Housing Tax Credit Qualified Areas - Glendale, AZ



Source: City of Glendale GIS

The following table provides a list of affordable housing units for the elderly, persons with disabilities by zip codes, and shows the HUD score assigned by the HUD's Real Estate Assessment Center. The Center conducts physical property inspections of properties that are owned, insured, or subsidized by HUD including public housing and multi-family assisted housing. The inspections ensure that assisted families have housing that is decent, safe, sanitary, and in good repair.

Table 29. Elderly and Special Needs Housing – Glendale, AZ

Project Name	# of Low-Income Units	Total Units	Program	Unit Types	Zip Code	HUD Score 100
Vista Alegre	60	60	Sec. 202	1-bedroom	85301	99
Valley of the Sun School 2	20	20	Sec. 811	1-bedroom	85301	92
Valley of the Sun School 6	23	23	Sec. 811	1-bedroom	85308	93
St John's Manor	42	42	Sec. 202	1-bedroom	85301	100
Waymark Gardens	150	151	Sec. 202	1-bedroom	85302	97
Bethany Glen Apts.	150	150	Section 8 LMSA	1, 2, & 3-bedroom	85301	94
Total	445	446				

The Glendale Community Housing Division had over 1,358 section 8 housing choice vouchers. Since these vouchers are used to rent housing from private landlords, there is a wider dispersion in where, in the City, those vouchers are used. While the vouchers are dispersed over the City, there are some census tracts in which units are more concentrated relative to other census tracts. However, the concentrations were low. The highest concentrations of section 8 vouchers were in tract 927.15 at 13%, the next concentrations ranged from 5.3% to 6.8% in tracts 931.02, 930, 1042.24, 923.08, 925, and 923.07. Census tracts that had the lowest concentration of less than 1.5% included 303.26, 303.47, 923.05, 923.06, 923.10, 927.04, 927.06, 929, 937.13, 971.04, 1042.14, 1042.15, 1042.16, and 1042.27. It can be noted from the income level #2, on p. 15 that the tracts that had the highest concentration of Section 8 assisted housing were in areas that were predominantly moderate- and -middle income households. Only two of 15 tracts were tracts with predominately low- income households.

### Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for persons with disabilities, you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a person with disabilities as “any person who has a physical or mental impairment that substantially limits one or more major life event (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment”-

The most recent comprehensive data on disability status among Glendale's population was the U.S. Census 2013 ACS. According to the 2013 ACS, 11.2% (25,751 persons) of Glendale's civilian non-institutionalized population reported a disability. The data included the following breakdown of the persons with disabilities by age group. The highest percentage of persons with disabilities occurred in the 65 and- over population group (39.7%). The 2013 ACS data is summarized in Table 30.

*Table 30. Disability Status of the Civilian Non-Institutionalized Population*

<b>Population Status</b>	<b>Number</b>	<b>Percentage</b>
<b>Total Population</b>	229,541	100%
<b>With a Disability</b>	25,751	11.2%
<b>Population Under 5 years</b>	16,400	7.1%
<b>With a Disability</b>	277	1.7%
<b>Population 5 to 17 years</b>	44,671	19.5%
<b>With a Disability</b>	2,201	4.9%
<b>Population 18 to 64 years</b>	146,114	63.7%
<b>With a Disability</b>	14,407	9.9%
<b>Population 65 years and over</b>	22,356	9.7%
<b>With a Disability</b>	8,866	39.7%

Source: US. Census, 2009-2013 ACS 3-Year Estimate

The 2013 ACS also provides information regarding types of disabilities within the Glendale population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the City, and the least common disability reported among Glendale residents was vision difficulty. Within the 65 and over age group, the most common disabilities are ambulatory, hearing, and independent living; while the majority of persons with disabilities in the 18 to 64 age group have ambulatory and cognitive difficulties. Glendale's total population with disabilities is 11.2% compared to Maricopa County and Arizona, where 10.2% and 11.8% report a disability, respectively. The population group with the largest percentage of persons with disabilities in Maricopa County and Arizona is also the elderly, where 32.9% and 33.8% of senior residents report some type of disability. Table 31 below, shows the breakdown of persons with disabilities based on type of disability and age for 2013.

*Table 31. Disability Characteristics of the Population - Glendale, AZ*

<b>Population/ Characteristic</b>	<b>Total</b>	<b># With a Disability</b>	<b>% With a Disability</b>
<b>Total Population</b>	<b>229,541</b>	<b>25,751</b>	<b>11.2%</b>
Population under 5 years	16,400	277	1.7%
With a hearing difficulty		260	1.6%
With a vision difficulty		156	1.0%
Population 5 to 17 years	44,671	2,201	4.9%
With a hearing difficulty		242	0.5%
With a vision difficulty		401	0.9%



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Population/ Characteristic	Total	# With a Disability	% With a Disability
With a cognitive difficulty		1,568	3.5%
With an ambulatory difficulty		473	1.1%
With a self-care difficulty		630	1.4%
Population 18 to 64 years	146,114	14,407	9.9%
With a hearing difficulty		2,644	1.8%
With a vision difficulty		2,516	1.7%
With a cognitive difficulty		6,446	4.4%
With an ambulatory difficulty		8,213	5.6%
With a self-care difficulty		2,882	2.0%
With an independent living difficulty		5,593	3.8%
Population 65 years and over	22,356	8,866	39.7%
With a hearing difficulty		4,000	17.9%
With a vision difficulty		1,741	7.8%
With a cognitive difficulty		2,082	9.3%
With an ambulatory difficulty		6,537	29.2%
With a self-care difficulty		2,336	10.4%
With an independent living difficulty		4,047	18.1%

Source: US. Census, 2009-2013 ACS 3-Year Estimate

Many of the persons with disabilities in Glendale have more than one reported disability. Therefore, there is duplication between categories of disability characteristics. Of the number of persons with disabilities, 2,826 (52.4%) report having two or more disabilities. Approximately 56% of elderly persons with disabilities report having two or more disabilities, and 55% of persons between the ages of 18 and 64 with disabilities have two or more disabilities.

*Table 32. Age and Number of Disabilities - Glendale, AZ*

Population	Number
<b>Total Population</b>	<b>229,541</b>
<b>Population under 18 years</b>	61,071
With one type of disability	1,608
With two or more types of disability	870
<b>Population 18 to 64 years</b>	146,114
With one type of disability	7,379
With two or more types of disability	7,028
<b>Population 65 years and over</b>	22,356
With one type of disability	3,428
With two or more types of disability	5,438

Source: US. Census, 2009-2013 ACS 3-Year Estimate

To further analyze the housing challenges of persons with disabilities in Glendale, the CHAS data was examined to determine the extent of housing problems and housing needs, particularly for low- and moderate-income independent disabled households. Information on disability status is available in the



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2008-2010 ACS. The data provides the most recent detailed data of housing problems of disabled residents based on their household income.

In Glendale there were 37,565 independent disabled households, of which 20,875 (55.6%) were low- and moderate-income. According to the CHAS data, 15,425 low- and moderate-income disabled households had housing problems. Within disabled renter households, 79.9% with household incomes less than 30% AMI had housing problems; 87.0% with household incomes greater than 30% but less than 50% AMI had housing problems; and 79.5% of households with incomes greater than 50% but less than 80% AMI had housing problems. The CHAS data for total disabled households and renter households is provided in Tables 33 and 34 below.

*Table 33. Independent Disabled Households with Housing Problems - Glendale, AZ*

Income Category	Number of Independent Disabled Households	# of Independent Disabled Households with Housing Problem	% of Independent Disabled Households with Housing Problem
<b>Extremely Low Income</b>	7,460	6,230	83.5%
<b>Low Income</b>	6,445	5,080	78.8%
<b>Moderate Income</b>	6,970	4,115	59.0%
<b>TOTAL Low/Moderate-Income</b>	<b>20,875</b>	<b>15,425</b>	<b>73.9%</b>

Source: 2008-2010 CHAS

*Table 34. Independent Disabled Renter Households with Housing Problems - Glendale, AZ*

Income Category	Number of Disabled Member Renter Households	# of Disabled Member Renter Households with Housing Problem	% of Disabled Member Renter Households with Housing Problem
<b>Extremely Low Income</b>	5,595	4,470	79.9%
<b>Low Income</b>	4,435	3,860	87.0%
<b>Moderate Income</b>	3,095	2,460	79.5%
<b>TOTAL Low/Moderate-Income</b>	<b>13,125</b>	<b>10,790</b>	<b>82.2%</b>

Source: 2008-2010 CHAS

The CHAS data shows that disabled households experience a greater incidence of housing problems with 73.9% of all disabled households having a housing problem compared to 69.2% of all low- and moderate-income households in Glendale.

While the CHAS data does not provide details on the type of housing problems faced by persons in disabled households, typically having a disability impacts earning potential and capacity to secure housing. Therefore, residents with disabilities often face housing affordability challenges. According to the 2013 ACS, in Glendale, 4,881 persons with a disability are a part of the labor force, 1,458 persons with a disability are unemployed, and 8,068 persons with a disability are not in the labor force. The median annual income of persons with disabilities is \$7,357 less than persons without a disability. A

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2008 Strategic Housing Study for Glendale prepared by BBC Research and Consulting found that of 10,200 cost burdened renter households 1,800 or 28% were disabled and may also be elderly, and many cost burdened owner households were also disabled.

In Glendale, housing for disabled persons consists of subsidized rental developments including LIHTC units, public housing units, Section 202 and 811 units, and group homes/adult living facilities. According to the HUD LIHTC Database, there are nine LIHTC properties in Glendale with a total of 1,568 units. None of the LIHTC are designated as disabled units however there are 1,440 low income units that can be accessed by persons with disabilities. In terms of public housing, the Glendale Housing Authority owns three public housing developments with 155 units and provides Section 8 housing choice vouchers to 1,054 households. The housing authority does not have any units designated for disabled households but does have a local preference for elderly and disabled applicants. The 2013 HUD Picture of Subsidized Housing reports that there are 3,144 persons in public housing in Glendale, and that 715 (22.7%) of these persons have a disability.

The HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities provides a listing of HUD insured and HUD subsidized multifamily properties that serve the elderly and/or persons with disabilities. The latest available inventory is from 2010 and includes five properties with 118 units designated for persons with disabilities. Table 35 provides details on each of the Section 202/811 properties that include units designated for persons with disabilities.

*Table 35. Section 202/811 Inventory of Units for Persons with Disabilities - Glendale, AZ*

<b>Property Name</b>	<b>Occupancy Eligibility</b>	<b>Total Units</b>	<b>Units Designated for the Disabled</b>	<b>Units Designated for the Elderly</b>
<b>Good Shepherd Homes of Arizona West</b>	Elderly and Disabled	50	50	50
<b>Kachina Place</b>	Elderly and Disabled	39	3	36
<b>Tanner Terrace</b>	Elderly and Disabled	155	20	135
<b>Valley of the Sun School I</b>	Disabled	25	25	0
<b>Valley of the Sun School II</b>	Disabled	20	20	0

Source: 2010 HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities

For those persons with a disability that own their home and live independently or have in home care, the City and several non-profit agencies fund the rehabilitation, repair, and modification of these units. The City in collaboration with the Arizona Bridge to Independent Living (ABIL) operates the Home Modification Program for Persons with Disabilities for structural modifications including wheelchair ramps, widened doors, grab bars, and modifications to showers, sinks, and toilets. Other organizations that carry out home repair and modification include Duet, Rebuilding Together Valley of the Sun, and Foundation for Senior Living, and Area Agency on Aging.

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Based on the ACS and CHAS data, there is a significant need for affordable housing and supportive services for disabled persons. The extent of the need is difficult to quantify because of insufficient data on the number of accessible units in the City, particularly in the private market. The lack of affordable and accessible housing for persons with disabilities is an impediment to fair housing choice.

### Homeownership by Race and Ethnicity

Table 36 depicts homeownership rates by race and ethnicity in Glendale, Maricopa County, and other neighboring communities. Rates of homeownership vary widely by race/ethnicity in the City of Glendale and its neighboring communities. The overall rate of homeownership in Glendale, for all races, was 56.3% (2013 ACS). In all the communities examined, Whites have the highest rate of homeownership followed by Asians and then persons of Hispanic ethnicity. Black/African Americans and American Indian/Alaska Native households have the lowest homeownership rate in most of the communities. There is not a significant number of Native Hawaiian and other Pacific Islanders in the region.

The Home Mortgage Disclosure Act (HMDA) Data Analysis section of this document will evaluate whether there are any discriminatory lending practices in Glendale that contribute to the lower homeownership rate for minorities.

*Table 36. Comparison of Homeownership Rates by Race/Ethnicity by Jurisdiction*

County or City	Overall Ownership Rate	Ownership Rate - White	Ownership Rate – Black/African American	Ownership Rate – American Indian	Ownership Rate - Asian	Ownership Rate – Pacific Islander	Ownership Rate – Hispanic
Glendale	56.3%	64.9%	29.3%	25.2%	74.1%	N/A	44.7%
Chandler	62.7%	66.9%	36.5%	54.0%	69.1%	30.9%	52.8%
Maricopa County	60.9%	68.4%	32.1%	38.1%	57.4%	30.3%	46.4%
Mesa	59.7%	67.4%	24.4%	32.2%	54.7%	N/A	40.9%
Peoria	69.6%	73.3%	32.9%	36.6%	83.4%	N/A	56.5%
Phoenix	53.8%	62.8%	30.1%	28.0%	49.6%	25.8%	43.7%
Scottsdale	65.5%	69.5%	13.4%	23.1%	51.8%	N/A	42.7%

Source: US. Census, 2009-2013 ACS 3-Year Estimate

### Recent City Housing Accomplishments and Use of Resources

The City of Glendale receives Community Development Block Grant (CDBG) funds, Emergency Solutions Grant (ESG) program funds as a direct entitlement from the U.S. Department of Housing and Urban Development (HUD). Glendale's entitlement for Program Year 2013-14 is \$2,090,571 and \$151,996 in CDBG and ESG grant funds, respectively. In addition, Glendale received \$481,541 in HOME Investment Partnership (HOME) funds distributed through the Maricopa County HOME Consortium. The City allocated \$450,000 to the Residential Rehabilitation Program; \$37,761 to the Home Accessibility Program for the Disabled; \$350,000 to the Emergency Home Repair Program; and \$15,000 for Fair Housing Services. The Program Year housing goals are to rehabilitate seven (7) owner

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occupied housing units; provide home modifications to seven (7) housing units and emergency home repairs for 175 housing units.

The Single-family Housing Rehabilitation Program assist eligible homeowners with rehabilitation of their homes. The rehabilitation must do at least one of the following: increase energy efficiency, improve livability, and/or extend the life of the property. The types of rehabilitation include painting, roof repair/replacement, electrical, plumbing or mechanical repairs, and minor reconstruction or replacement of structural components. The Emergency Home Repair Program provides emergency home repairs for qualified low- income families and the elderly. The repairs are required to maintain the safety and habitability of the household and can include repairs to electrical, mechanical, plumbing, roofing, and home cooling units. The City utilizes a non-profit partner, Habitat for Humanity Central Arizona to provide emergency repair services.

The Home Modification Program for Persons with Disabilities (ABIL) provides structural modifications to homes occupied by persons with disabilities. Modifications include wheel chair ramps, widened doors, grab bars, and modifications to showers, sinks, and toilets. The Home Modification Program is a match program and clients are expected to pay for 10 percent of the cost through cash in-kind contribution or through other contributions. This program is administered by Arizona Bridge to Independent Living (ABIL).

The program guidelines state that the City of Glendale complies with the Fair Housing Act. Specifically, the City does not discriminate when loaning housing rehabilitation funds based on race, color, religion, sex, handicap, familial status, or national origin. The guidelines also state that the City permits reasonable modifications of existing dwelling units undergoing rehabilitation to improve accessibility. In addition, the City has its fair housing posters prominently displayed, and of proper size, so they can be read by all persons seeking housing. The City of Glendale letterhead and all housing brochures bear the Fair Housing Logo.

The City's housing accomplishments were evaluated from a review of their Consolidated Annual Performance Evaluation Reports (CAPERS) for Program Years 2010 – 2013. Table 37 below highlights the outcomes of the various housing programs. During the period reviewed, 415 owner occupied properties were rehabilitated; 43 single family homes were acquired for rehabilitation and resold to low income families; 99 Persons with Special Needs were assisted with home modifications for the Disabled and other services; 3 Public Infrastructure/Public Housing/Rental Housing renovations were completed; and 443 households were assisted with Fair Housing services.

The City of Glendale received two allocations of Neighborhood Stabilization Program (NSP1) funding through U.S. HUD as entitlement grants in 2009 and 2011, respectively, to develop rental and homeownership units for households with incomes at 120% and below of the Area Median Income (AMI). The status of the program activities as of December 31, 2014 are as follows:

- NSP1 – Grant of \$6,184,112.00 plus \$1,512,792.36 in earned program income for a total of \$7.69 million dollars. The City partnered with Habitat for Humanity to develop 29 homeownership units for households with incomes at 50% AMI and below. The funds were also used to assist 13 families at 120% AMI and below with down payment assistance to purchase houses. Two projects with a proposed 60 units and 49 units of rental housing have been delayed due to

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financing challenges. The land was acquired and has been placed in a land bank pending development.

- NSP3 – Grant of \$3,718,377.00 plus \$ \$297,402.00 in earned program income for a total of \$4,015,779. The City again partnered with Habitat for Humanity to develop 10 units for homeownership this time for households at 120% AMI and below. The City also used NSP3 funds to demolish 10 dilapidated residential structures leaving infill lots for future development. The City also provided NSP3 funding to the Ironwood Village project which was developed by a partnership between Gorman and Company, Catholic Charities and the Arizona Department of Housing. The project consisted of the acquisition and redevelopment of a vacant and foreclosed 115-unit property, and converted it into 95 affordable 2- and 3-bedroom units for households with incomes at 50% Ami and below. The project boasted LEED Gold standard energy efficiency upgrades. See photographs below:



The above mentioned NSP funded projects provided much needed affordable and accessible housing for low- and moderate-income and elderly households. Other examples of affordable and accessible housing projects follow:

**Palmaire Court** - An 11-unit project of Twin homes located in the City of Glendale on 54th avenue between Myrtle Avenue and Glenn Avenue being developed by Habitat for Humanity. The units are



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two-story single family attached three and four bedroom homes (duplexes attached at the garage).  
See photographs below.



**Glendale Enterprise Lofts-** a fully accessible 28-unit, mixed-income, loft rental housing development in downtown Glendale. Gorman and Company partnered with the Orchard Glen Neighborhood Association and Arizona Bridge to Independent Living (ABIL) to develop the project, which boasts of 'Universal Design' principles of 100% accessibility and 'visitability', as well as a wide range of amenities. See photograph below:



In addition to the above examples, the City recently processed a substantial amendment to its CDBG Annual Action Plan for Fiscal Year (FY) 2014-2015 to apply for and utilize \$200,000 in HOME funds through an Intergovernmental Agreement with the Maricopa HOME Consortium and the City of Scottsdale. The HOME funds will be used under an amendment to an existing agreement with Habitat for Humanity to purchase and rehabilitate vacant homes, or purchase land to construct new homes for sale to households at 80% AMI in the 85301, 85302, and 85303 zip codes. At least four (4) homes will be produced.



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*Table 37. Recent City Accomplishments - Glendale, AZ*

Program Year	Accomplishments
2010	<ul style="list-style-type: none"> <li>• 169 Homes Rehabilitated/Replaced (Rehabs/Exterior Improvements/Replacements)</li> <li>• 21 Single-Family homes acquired for rehabilitation and resold to low income first- time homebuyer families</li> <li>• 55 Persons with Special Needs assisted, including 34 home modifications for the Disabled and 21 received other services.</li> <li>• 1 Public Infrastructure Public Housing or Rental Housing renovations completed</li> <li>• 109 Households assisted with Fair Housing</li> </ul>
2011	<ul style="list-style-type: none"> <li>• 194 Homes Rehabilitated/Replaced (Rehabs/Exterior Improvements/Replacements)</li> <li>• 9 Single-Family homes acquired for rehabilitation and resold to low income first-time homebuyer families</li> <li>• 15 Persons with Special Needs assisted home modifications for the Disabled</li> <li>• 129 Households assisted with Fair Housing</li> </ul>
2012	<ul style="list-style-type: none"> <li>• 28 Homes Rehabilitated/Replaced (Rehab/Exterior improvements/Replacements)</li> <li>• 5 Single Family homes acquired for rehabilitation and resold to first-time homebuyer families</li> <li>• 14 Persons with Special Needs assisted with home modifications for the Disabled.</li> <li>• 3 Public Infrastructure Public Housing or Rental Housing renovations in progress</li> <li>• 116 Households assisted with Fair Housing</li> </ul>
2013	<ul style="list-style-type: none"> <li>• 24 Homes Rehabilitated/Replaced (Rehab/Exterior improvements/Replacements)</li> <li>• 8 Single- Family homes acquired for rehabilitation and resold to low- income families</li> <li>• 15 Persons with Special Needs assisted with home modifications for the Disabled.</li> <li>• 5 Infrastructure Public Housing or Rental Housing renovations in progress</li> <li>• 89 Households assisted with Fair Housing</li> </ul>

Source: City of Glendale 2010-2010 Consolidated Annual Performance Evaluation Reports

### Fair Housing Actions

Fair Housing is a shared concern, regionally and locally, as illustrated in Glendale's Five-Year Consolidated Plan and the Maricopa County AI. Glendale completed the Analysis of Impediments (AI) to Fair Housing Choice in June 2010. The analysis identifies barriers to fair housing choice to prevent and address discriminatory housing practices based on race, color, national origin, sex, religion, disability and familial status. In this past year, Glendale continued to implement a three-pronged strategy to eliminate fair housing barriers by providing or supporting Advocacy, Education, and Enforcement. The analysis identifies barriers to free and unencumbered choice of, and access to housing. The table below describes the programs that were supported to carry out Fair Housing activities through advocacy, education, and enforcement of Fair Housing statutes.

*Table 38. Recent Fair Housing Actions - Glendale, AZ*

<b>Advocacy</b>	<b>Newspaper:</b> Glendale continues to advertise fair housing assistance and services by publishing non-legal notices, in Spanish and English, each month in a local newspaper of general circulation.
	<b>Television:</b> Glendale provides fair housing referral service through Glendale's cable channel. This is an informational channel with a reasonably widespread viewing audience in the community. The advertisement is in videotext format and appears at least three times daily.
	<b>Outreach Literature:</b> Fair housing posters are prominently displayed in locations within municipal facilities and at subrecipient locations.
	<b>Program Subrecipients:</b> Subrecipients funded under the CDBG, ESG, and HOME programs are required to comply with fair housing requirements.
	<b>City Web Site:</b> Glendale's web page offers links to several web sites to assist low-/moderate-income families and individuals. Two Divisions within Community Partnerships provide references to fair housing web sites – one in Community Revitalization and one in Housing. From there, information is available regarding rights and the process for filing complaints.
<b>Education</b>	<b>Legal Assistance and Counseling Assistance:</b> Glendale contracted with Community Legal Services to provide legal assistance, outreach, and training to educate private and public sector housing practitioners. This agency conducts workshops on issues related to fair housing. In addition, legal assistance and counseling is available to Glendale residents who feel they may have been victims of discrimination.
	<b>Counseling Assistance:</b> Community Housing Services counsels and assists Section 8 tenants to locate outside areas of poverty and minority concentrations. The Section 8 program is also marketed to rental property owners and managers throughout Glendale to avoid centralization.
<b>Enforcement of Fair Housing Statutes</b>	<b>Legal Counseling Assistance:</b> As part of the \$15,000 of CDBG administration funds listed above under Education, enforcement of fair housing statutes was also included in the Community Legal Services contract. Community Legal Services provides direct representation, and litigates on behalf of its Glendale clients with Fair Housing claims in courts and through the Arizona Attorney General's administrative Fair Housing
	<b>Testing for Housing Discrimination:</b> The Arizona Department of Real Estate is charged with testing for housing discrimination throughout the state.

### Glendale Public Housing

The City of Glendale's Community Housing Division (CHD) serves as the City's public housing authority (PHA), and is responsible for the administration of the Section 8 Housing Choice Voucher program and

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conventional Public Housing programs. CHD currently meets the rental needs of residents who cannot afford housing in the private market through owning and operating three (3) public housing sites with a total of 155 housing units and administering 1,054 section 8 housing choice vouchers to be used for rental of private homes. The City has been providing CDBG funding to make applicable units fully accessible to persons with physical disabilities. All housing units occupied by Section 8 certificate holders must meet HUD Housing Quality Standards (HQS) which require that the unit owner make reasonable accommodations, if necessary, for an occupant with mental or physical disabilities.

The agency's Resident Characteristic Report shows that 76% of the public housing residents are extremely low-income ( $\leq 30\%$  AMI), and 75% of housing voucher recipients are extremely low-income. The agency has a HUD designation of High Performer with a score of 95 out of a possible 100 from its last assessment done on June 17, 2011 by HUD's Real Estate Assessment Center. The units owned by the Glendale PHA were inspected on December 15, 2008, and August 10, 2010, with an inspection score of 97 and 88, respectively. The agency plans to continue modernizing kitchens and bathrooms; make units energy efficient; continue to replace aging HVAC units, windows and doors with more efficient products; complete HQS on all Section 8 and public housing units annually; and work with landlords to educate them on successful landlord practices.

The PHA Five-Year Plan described the characteristic of families on the waiting lists for public housing and Section 8, as follows: 34% are one-person household; 29% are two-person households; and 12% are four or more person households. The waiting list for Section 8 consists of 36% Black, and 26% for public housing. Hispanic origin is 30% of the waiting list for Section 8 and 36% for public housing. White is 60% of the waiting list for Section 8 and 67% for public housing. According to the Five Year PHA Plan, 9% and 8% of those on the waiting list for Section 8 and Public Housing, respectively, are elderly. 11% of those on the waiting list for Section 8 and 6% on the list for Public Housing are disabled. The PHA does not track the immediate needs of its program participants. The PHA subsidizes the rent of program participants and refers families to other agencies for other needs. Based on the comparison provided in the Five-Year Plan, it appears that the needs were in line with the population at large.

### **Fair Housing Policies**

#### **Reasonable Accommodations**

According to the City of Glendale's Public Housing Plans, its Fair Housing policies are designed to provide all persons with disabilities reasonable accommodations to access and utilize housing programs and related services. The policies require that notice of availability of reasonable accommodations are included in the Community Housing Division (CHD) forms and letters to families and persons with disabilities who request reasonable accommodations. The policies also state that reasonable accommodations may be granted to persons with disabilities provided their disability is verified and does not create an undue financial and administrative burden on CHD.

#### **Exception Rents for Persons with Disabilities**

The Public Housing Fair Housing policies provide for CHD to approve an exception rent up to 120 percent of the Fair Market Rents, as a reasonable accommodation to a family member who is a person with a disability.

### **Medical Marijuana**

The Public Housing Fair Housing policies also state that CHD is not required by federal and state non-discrimination laws to permit use of medical marijuana as a reasonable accommodation by current and prospective disabled residents. This policy is based on HUD's General Counsel opinion that use of medical marijuana is not reasonable accommodation because such accommodation are not reasonable under Fair Housing Act and constitute a fundamental alteration in the nature of the operations of the program (HUD General Counsel Opinion on Medical Marijuana, 1/20/2011, pages 1-2).

### **Special Housing Types**

The Public Housing Fair Housing policies permit the use of Special Housing types, if it is needed as reasonable accommodation for persons with disabilities. Applicants who request reasonable accommodation must provide CHD with documentation from knowledgeable professionals familiar with the applicant disabilities and/or type of special housing needed. CHD will provide a written response to the applicant within 10 calendar days of receipt of a request. Any of the following Special Housing Types may be used:

- Single- Room Occupancy Housing
- Congregate Housing
- Group Home
- Shared Housing
- Cooperative Housing
- Manufactured Housing

The Public Housing Fair Housing policies also provides that a participant can request, as a reasonable accommodation, that he or she be permitted to make physical modifications to their dwelling unit, at their own expense. The participant must make the request to the property owner/manager as CHD does not have responsibility for the owner's unit and have no responsibility to make the unit accessible. CHD may, however, grant a higher payment standard for units where property owners make physical modifications for persons with disabilities so long as the payment standard does not exceed 110% of FMRs.

### **Voucher Use as Reasonable Accommodation**

The Glendale City Council adopted by Resolution in March 2014, the 2014 Public Housing Agency Plan and authorized its submission to HUD. The adopted Plan included the Conventional Public Housing Admissions and Continued Occupancy Policy –Section 2.3, Alternative Voucher Use as Reasonable Accommodation. A review of the attachments in the City Council Report” indicates that the language included in Section 2.3 in the Conventional Public Housing Admissions and Continued Occupancy Policy was for purposes of clearly defining the use of a Section 8 Housing Choice Voucher as an alternative in order to meet the requirement of five percent (5%) of conventional public housing units handicapped accessible. The specific language is as follows:

“In order to meet requirements of HUD Public and Indian Housing (PIH) Notice 2006-13, Non-discrimination and Accessibility for Persons with Disabilities, if the accessible conventional public housing unit does not meet the needs of the person/family requesting a reasonable accommodation, and if the change will create an undue financial hardship or administrative burden, Glendale Housing will make available a Section 8 Voucher. There are a limited number of vouchers available for this

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purpose to ensure Glendale Housing can meet the requirement for five percent of units in a project to be accessible, and up to two percent accessible for persons with hearing impairment. The use of a voucher for this purpose is not designed to give the family a voucher option that is normally unavailable to conventional public housing applicants, nor is it designed for a public housing eligible family to receive a voucher if there are no vacancies. The family will remain assisted under conventional public housing and will be limited to the conventional public housing policies and regulations. The number of vouchers available for this use is minimal, and only six total vouchers will be made available. The six vouchers are comprised of: One Bedroom Unit – 1; Two- Bedroom Unit - 2; Three- Bedroom Unit – 2; and Four- Bedroom Unit – 1”.

As Glendale Housing increases its number of accessible public housing units, the vouchers available will be reduced accordingly.

CHD provides assistance to applicants who have difficulty communicating in English or have a hearing impairment, and will make available bilingual staff or provide them access to persons who speak languages other than English.

CHD also post in each of its offices, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, a notice that the following information is available upon request:

- A. Statement of Policies and Procedures governing Admission and Continued Occupancy
- B. A listing of all the developments by name, address, number of units, units designed with special accommodations, address of all project offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours
- C. Utility Allowance Schedule
- D. Current Schedule of Routine Maintenance Charges
- E. Dwelling Lease
- F. Grievance Procedure

The following information is also posted in the lobby of the housing administrative office:

- A. Notice of the status of the waiting list (opened or closed)
- B. Income Limits for Admission
- C. Fair Housing Poster
- D. Equal Opportunity in Employment Poster

### **Tenant Briefing**

CHD requires that a family selected from the waiting list attend a briefing which explains how the program works in order to receive a voucher. The briefing can be rescheduled, however, if the family fails to attend two briefings without good cause, they will be denied admission.

CHD will provide an applicant with a disability auxiliary aids to gain full benefit from the briefing, if furnishing such aids will not result in a fundamental alteration of the nature of the program or in an undue financial or administrative burden. In determining the most suitable auxiliary aid, CHD will give primary consideration to the requests of the applicant. Families unable to attend a briefing due to a disability may request a reasonable accommodation such as having the briefing presented at an



alternate location.

The briefing will cover at least the following subjects:

1. A description of how the program works;
2. Family and owner responsibilities;
3. Where the family may rent a unit, including inside and outside CHD's jurisdiction;
4. Types of eligible housing;
5. An explanation of how portability works;
6. An explanation of the advantages of living in an area that does not have a high concentration of poor families;
7. An explanation that the family share of rent may not exceed 40% of the family's monthly adjusted income at initial eligibility, if the gross rent exceeds the applicable payment standard and;
8. An explanation of the information contained in the Briefing Packet.

The Briefing Packet contains various program information including HUD-required lead-based paint brochure, Information on Federal, State, and local equal opportunity laws; the brochure "Fair Housing: It's Your Right;" a copy of the housing discrimination complaint form; and a notice that if the family includes a person with disabilities, the family may request a current list of accessible units known to CHD that may be available.

### **Landlord Fair Housing Training**

CHD does not provide fair housing training for landlords and they are only required to attend the initial program briefing with the tenant prior to signing a Housing Assistance Payments Contract (HAPC). ASK Development Solutions discussed with CHD staff the feasibility of requiring landlord fair housing training in order to participate in the Section 8 housing program. Staff advised that they intend to implement fair housing training for landlords in the near future.

### **Grievance Procedures**

City of Glendale, Community Services Division (CHD) Grievance Procedure applies to all individual grievances including grievances pertaining to individuals with handicaps (Section 504 grievances) between the tenant and CHD. CHD does not have to follow its grievance procedure for evictions if the tenant is a threat to the health or safety of other tenants, CHD employees, vendors, or contractors.

According to CHD public housing policy, "grievance" means any dispute that a tenant may have with respect to CHD action or failure to act in accordance with the individual tenant's lease, CHD regulations, which adversely affect the individual tenant's rights, duties, welfare, or status. The grievance must be submitted in writing within five (5) business days from the date of the termination notice to CHD office so that it may be discussed informally and settled without a hearing. A summary of the discussion is prepared within ten (10) business days, one copy is given to the tenant, and one retained in CHD tenant file. It specifies names of the participants, dates of meeting, the nature of the proposed disposition of the complaint, the specific reasons therefore, and the procedures by which a hearing may be obtained if the complainant is not satisfied. The complainant can submit a written request for a hearing to CHD within five (5) business days after receipt of the summary of discussion.



### **Ineligible Immigration Status**

Applicant families who are denied assistance on the basis of ineligible immigration status may request that CHD provide for an informal review process after the family has notification of the Immigration and Naturalization Service (INS) decision on appeal, or in lieu of request of appeal to the INS. This request must be made within 30 calendar days of receipt of the *Notice of Denial or Termination of Assistance*, or within 30 calendar days of receipt of the INS appeal decision. Participant families can also request an informal hearing if their assistance is terminated based on ineligible immigration status. The timeframe to submit the request is the same as for applicant families.

CHD must provide reasonable accommodations for persons with disabilities to participate in the hearing. Reasonable accommodations can include qualified sign language interpreters, readers, accessible locations, or attendants. If the resident is visually impaired, any notice to the resident that is required must be in an accessible format.

### **Discrimination Complaints**

As discussed previously, CHD will assist complainants who believe they are being discriminated against on the basis of race, color, religion, sex, familial status, national origin, or handicap and CHD grievance procedure does not preclude complainants from exercising their rights to file discrimination complaints.

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## City Regulatory Review

This section focuses on the review of local public sector policies that affect housing choice by limiting or excluding housing facilities for persons with disabilities or other protected classes from certain residential areas. HUD believes that there are instances where policies have the effect of violating the provisions of the Fair Housing Act since they may indirectly discriminate against members of the protected classes such as persons with disabilities and racial and ethnic minorities.

In order to make this determination, the Consultant examined the City of Glendale's Comprehensive Plan – Glendale 2025 The Next Step General Plan, the City's Zoning Ordinance, Parks and Recreation Master Plan, and the 2011 Parks and Recreation Master Plan update. In addition to the review of these adopted policies, the Consultant provided a questionnaire to the City to assist in the preparation of the Analysis of Impediments to Fair Housing Choice Study. The purpose of the questionnaire was to review public policies and practices concerning the Zoning Code and Comprehensive Plan as it relates to fair housing choices, particularly housing for persons with disabilities. The following information was garnered from the examination undertaken and the questionnaire.

In reviewing the City's regulations, laws, and ordinances, both a preventative and a curative approach was used. William Tisdale, in a 1999 journal article titled *Fair Housing Strategies for the Future: A Balanced Approach*, called for a more balanced approach to fair housing using strong and meaningful partnerships between the public and private sectors. He opined that *"the interpretation of fair housing law and regulation as a directive, rather than a suggestion, has been generally ignored by policymakers at all levels of government. These policymakers fail to recognize the long-range and detrimental effects that housing segregation has on all of society, not just members of minority groups. Since the fair housing laws were passed, government has moved with all deliberate lethargy to enforce them and, in many instances, has participated in obstructing and impeding their enforcement. Subsequently, housing discrimination is still commonplace."*<sup>7</sup>

Governmental entities, fair housing advocates, and practitioners may choose to wait until discriminatory practices are demonstrated in the form of community resistance to affordable housing projects, media stories, or litigation to institute enforcement measures, or a report such as the AI identifies impediments. While enforcement and education is needed, a preventative approach seeks to incorporate and make the concept of affirmatively furthering fair housing and fair housing concepts an integral part of a City's housing and community development related policies and practices. For example, the idea of promoting a community as a welcoming place for all people groups; showing images of persons of all races, color, creed, disability; and having a referral network to help them access services, is not a popular approach.

One of the best places to begin the education, awareness, and sensitivity process is to include language and concepts related to fair housing in the planning process. It will be noted where the City of Glendale could use preventative and proactive strategies in this regard.

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<sup>7</sup> William Tisdale. 1999. "[Fair Housing Strategies for the Future: A Balanced Approach](http://www.huduser.org/portal/Periodicals/CITYSCPE/VOL4NUM3/tisdale.pdf)," *Cityscape: A Journal of Policy Development and Research* 4:3, 149, Cityscape, page 147. Accessed March 30, 2015.  
<http://www.huduser.org/portal/Periodicals/CITYSCPE/VOL4NUM3/tisdale.pdf>

### **Regulatory Barriers and NIMBYism**

Historically, communities have utilized land use regulations and zoning codes as to identify regulatory barriers to affordable housing and recommend how those barriers could be removed. A regulatory barrier to the development of affordable housing is any regulation, code, payment, or process that is established (often with good intentions) to provide community and neighborhood benefits but inadvertently restricts the development or availability of affordable housing. The restriction occurs when the regulation, payment, or process may be excessive, unnecessary, duplicative, or more costly and therefore could limit supply. For example, some code enforcement requirements that are not health and safety related and historic rehabilitation requirements often leave low-income homeowners unable to do necessary repairs, or raise the cost of new development by up to 35 percent. Such barriers prevent many households from buying or renting decent and affordable housing that they could afford if not for the increased costs.

In 1991, HUD published the Report “Not in My Back Yard” - Removing Barriers to Affordable Housing. Among the regulatory barriers studied was zoning and land use development requirements, which has a direct impact on the location of low-cost housing, and, therefore, an impact on residents seeking low-cost housing. The 1991 Study stated that development controls and regulations have a direct impact upon where people live, how they manage and use their property, what lifestyle and living arrangements they choose, who their neighbors are, and what their residences cost. If those controls and regulations fail to address equitably the needs of all citizens, if they provide benefits to some while limiting housing choice and opportunity for others, they violate the public purpose in whose name they are enacted.

HUD updated the 1991 Report in February 2005. HUD’s updated report “Why Not in Our Community?” - Removing Barriers to Affordable Housing stated that the basic findings of the 1991 Report remained true for the 2005 Update Report: exclusionary, discriminatory, or unnecessary regulation constituted formidable barriers to affordable housing. The Report acknowledged that progress had been made, but that it was difficult to identify when a local policy is a regulatory barrier, and that each policy or rule must be assessed on its own merit.

The 1991 Report determined that perhaps the most potent and intractable cause of regulatory barriers to affordable housing was NIMBY (Not in My Back Yard) sentiment at the individual and community level. The 2005 Update Report announced that it hoped HUD initiatives will change the NIMBY sentiment to “why not in our community?” The desire for the change was because HUD is aware that the NIMBY sentiment may be expressing opposition to types of housing, to changes to the community, to certain levels of growth, to any and all development, or to economic, racial, or ethnic heterogeneity. It can reflect concern about property values, service levels, fiscal impacts, the environment, community ambience, or public health and safety. The report adds that the NIMBY sentiment’s more perverse manifestations reflect racial or ethnic prejudice masquerading under the guise of the above mentioned concerns. Most importantly, though, according to HUD’s 1991 Report, NIMBY sentiment can easily translate into government action, given the existing system for regulating land use and development, to the exclusion of nonresidents, prospective residents, or, for that matter, all outsiders.

In a HUD publication on America’s Affordable Communities Initiative, it was noted that HUD “is encouraging and helping state and local governments to develop their own unique solutions to regulatory barriers that unnecessarily drive up the cost of housing in their own communities. Far from attempting to become a super zoning authority, the Department is leading by example by identifying

and removing federal regulations that may contribute to the high cost of housing.”<sup>8</sup> To operationalize the Initiative, HUD, along with other strategies, established the Regulatory Barriers Clearinghouse website at [www.regbarriers.org](http://www.regbarriers.org) to provide state and local governments a forum and valuable research tools to address regulatory barriers. One of the tools is a matrix of common regulatory barriers and potential solutions.

In a memo entitled Glendale General Plan Updated and the Zoning Ordinance dated January 2015, the City’s Planning Director stated that no “drastic changes” were anticipated for stable neighborhoods that are built out or taking any zoning action that create an impediment which negatively impacts the housing choices of low- to moderate-income residents.

There was some anecdotal evidence from focus group participants regarding NIMBYism related to complaints regarding persons with disabilities in neighborhoods in the context of group homes. Complaints regarding the use of motorized wheelchairs and their “disruptive” impact was cited. Other participants noted that typically persons with disabilities are usually embedded in communities and neighbors were unaware of their presence. A review of the City records did not show any evidence of NIMBY sentiment leading to the disapproval of projects that met zoning, land use and permitting requirements. Another typical target of the NIMBY sentiment is Habitat for Humanity housing. Habitat for Humanity of Central Arizona assists low income families in several cities in Maricopa County and is the City’s main developer of newly constructed single family ownership housing and provides rehabilitation assistance to existing low income homeowners. Habitat has developed a good reputation in the community for building excellent affordable housing and does not seem to be the target of the NIMBY sentiment in Glendale.

### **Discriminatory Effect**

Another concept that is used to assess impediments to fair housing in this study is “discriminatory effect.” Subpart G 100.500 (a) of the February 15, 2013 fair housing regulations define discriminatory effect as follows: “A practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.”

HUD explains that the February 15, 2013 Fair Housing Act’s Discriminatory Standard Rule formalizes the longstanding interpretation of the Fair Housing Act to include discriminatory effects liability and establishes a uniform standard of liability for facially neutral practices that have a discriminatory effect. It adds that under this rule liability is determined by a “burden-shifting” approach. The charging party or plaintiff in an adjudication first must bear the burden of proving its prima facie case of either disparate impact or perpetuation of segregation, after which the burden shifts to the defendant or respondent to prove that the challenged practice is necessary to achieve one or more of the defendant’s or respondent’s substantial, legitimate, nondiscriminatory interests. If the defendant or respondent satisfies its burden, the charging party or plaintiff may still establish liability by demonstrating that this

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<sup>8</sup> HUD website. <http://archives.hud.gov/initiatives/affordablecommunities/regulatoryreform.pdf>. Accessed March 28, 2015.

substantial legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Subpart B Section 100.70 (d) adds subsection (5) as other prohibited conduct under discriminatory housing practices – enacting or implementing land-use rules, ordinances, policies, or procedures that restrict or deny housing opportunities, or otherwise make unavailable or deny dwelling to persons because of race, color, religion, sex handicap, familiar status, or national origin.

As it relates to discriminatory effect, a review of the City's Planning and Zoning Regulations identified that there are limitations on group homes such as proximity which may impact persons with disabilities. Group homes are covered by the special group residential housing definition in the City's Zoning Code. It states that special group residential housing includes a dwelling shared, as their primary residence, by at least six (6) but not more than 10 persons with disabilities who are not related to the owner or manager of the dwelling.

### **Accessibility**

Section U.S.C. 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multi-family housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act cover a wide range of residential housing including, but not limited to, apartments, condominiums, single room occupancy units, public housing, extended stay and residential hotels, nursing homes, dorms, shelters, and other units funded through federal block grant funds. Redevelopment of an existing property to add four or more units or public and common areas is considered a new building and subject to the provisions. Per U.S.C. 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not typically subject to the provisions, those that are funded with federal block grant funds may be subject to the provisions.

In addition to provisions in the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed, built, altered, or leased with federal funds.
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds.
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.



## **Review of Comprehensive Plan**

A Comprehensive Plan is defined as a long-term guide for the development of a community outlining existing conditions and providing goals, policies, and actions to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Comprehensive plans are typically developed with input from stakeholders in the community, and function as a living document used in the decision making process for current and future community leaders. A comprehensive plan provides guidance for the City's future in regards to the type and intensity of development, land uses, and open space.

The City's previous General Plan was adopted by Resolution in 1989. The updated Comprehensive Plan, *Glendale 2025 The Next Step* General Plan was adopted in May 2002. Glendale 2025 The Next Step focuses on several areas including land use and character, growth capacity, facilities, and infrastructure, housing and neighborhoods, economic development, energy, and implementation. According to information on the city's website, work is underway on the General Plan update, *Glendale 2040-Envision Glendale*.

The purpose of reviewing the City's Comprehensive Plan is to identify to what extent the Plan helps the City to implement its commitment to equal housing opportunity, and to what extent portions of the Plan may serve as impediments to fair housing choice for persons protected by the FHA. As such, the review covers the following six subject areas because of their correlation with fair housing choice:

1. Inclusion of Protected Groups Demographic Descriptions
2. Plans for Affordable Housing/Diverse Communities
3. Reference to CDBG or Other Federal Housing Programs
4. Affirmatively Furthering Fair Housing
5. Compliance with Applicable Laws and Regulations
6. Other Items: Community Participation in the Planning Process

### 1. Inclusion of Protected Groups Demographic Descriptions

Glendale 2025, The Next Step does not contain information on the demographic and socioeconomic characteristics of the City of Glendale. Glendale relies on the Five- Year Consolidated Plan to address issues of affordability, health, safety, and special population needs. Also, the 2011 Parks and Recreation Master Plan update- Community Needs section provides detailed data on Glendale's demographics from the 2010 US Census. The demographic profile includes information on racial groups, age, and household income.

As a proactive and preventative approach, inclusion of information about the race, national origin, familial status, or disability status of persons in a Comprehensive Plan is one way to help remind a community that it is composed of a significant number of persons who are most likely to need the protection of the FHA in their attempts to find or occupy housing in the community. Including a demographic profile can help ensure that protected group persons are not excluded or neglected when communities make plans that involve housing and community related issues. It is recommended that the City include protected class demographic data in its Comprehensive Plan.



## 2. Plans for Affordable Housing/Diverse Community

Chapter 4 of the Comprehensive Plan, Housing Element identifies the general principles applied to the City's housing strategy as listed below.

- *Implement and update the provisions of the Glendale Five-Year Consolidated Housing Plan;*
- *Provide the citizens of Glendale choice from a wide variety of housing types;*
- *Promote quality, affordable housing for every citizen of the City of Glendale;*
- *Provide appropriate housing options or assistance for the special needs population;*
- *Create and maintain safe, well ordered neighborhoods*

The Plan includes policies and recommended actions for diverse types and affordable housing. The policies for diverse housing include encouraging planned residential communities that provide a range of housing unit diversity in development to promote socio-economic balance in the Glendale housing market. Recommended actions include creating and implementing incentives for private development of affordable housing through the utilization of potential mechanisms such as fee waivers, or fee reductions, fast track permitting, density increases or transfers; adding incentives for the facilitation of infill housing and the quality redevelopment of housing stock in areas of substandard or obsolete housing; facilitating the planning, expedited permitting, and construction of housing and residential facilities designed to serve the elderly and disabled populations of Glendale; requiring variety in siting, floor plans, elevations, massing, materials, and color schemes in housing units to avoid repetitive sameness in housing developments and in infill locations; and provide housing areas that allow homeowners to move up in home size, quality, and price.

Some of the City's affordable housing policies include planning vehicular and non-vehicular traffic circulation to accommodate the traffic generated by higher density multi-family developments; partnering with the private sector to meet goals of safe, decent and affordable housing; and combining City efforts with those of social service agencies to meet the shelter needs of special populations.

The FHA does not include income status as a protected class. The FHA does not mandate that communities plan for constructing or assisting in the construction of "affordable" housing or require that communities be, or advertise themselves as, "diverse communities." However, HUD has recognized that inclusion of "affordable housing" and promotion of a community as a "diverse community" are steps that communities can take to "affirmatively further fair housing." Specifically, HUD requires that housing development activities not have an unjustified discriminatory effect. Racial minorities, some recent immigrants, single mothers with children, and persons with disabilities, all protected by the FHA, are over represented in the low- and moderate-income categories, and are among the persons most likely to need "affordable" housing. Taking steps to address the housing needs of lower income persons and to establish respect for a "diverse" community are therefore viewed by HUD as "affirmative fair housing actions." While the City's Plan includes several recommendations which would improve the supply of housing and address fair housing, the City has not operationalized these planning concepts. It is recommended that the City review its planning concepts of affordable housing and diverse communities contained in the Comprehensive Plan and develop strategies to make these a reality.

### 3. Reference to CDBG or Other Federal Housing Programs

This review is done to determine if the Comprehensive Plan and related documents include a reference to the existence and value of the CDBG and/or other Federal housing programs, as the City is a recipient of those funds. CDBG and other Federal housing program funds are reliable and important parts of the community development programs for communities throughout the nation, including the City of Glendale. Expected uses for CDBG funds can be incorporated into the planning process and can become reliable components of a Comprehensive Plan. Inclusion of references to CDBG and other Federal housing programs in Master Plans also serves as a way to inform residents of the valuable existing relationships and those that can be developed, between Local, State, and Federal governments. Per the Comprehensive Plan, the City will continue to pursue CDBG and other federal funds to address issues of affordability, health, safety, and special needs. The Comprehensive Plan also identifies prior uses of CDBG funds.

### 4. Affirmatively Further Fair Housing

Each community that accepts Federal CDBG funds must certify that it will “affirmatively further fair housing”. The City of Glendale is a direct recipient of CDBG funds from US HUD, and is responsible for ensuring that the City has taken actions to meet the requirements of the certification.

The City should utilize relevant information and findings from its Analysis of Impediments to Fair Housing Choice and Status of Previous Impediments 2010, as a basis for determining housing policies and recommendations in its new Comprehensive Plan update, Glendale 2040-Envision Glendale. City staff identified Glendale’s Key Impediments and Proposed Activities/Actions that should be implemented to address the impediments, and reported on the current status of the proposed activities/actions. See Appendix #2 for a status report on previous 2010 impediments, actions taken and funding invested.

### 5. Compliance with Other Civil Rights Related Program Requirements

The FHEO administers, in addition to the Fair Housing Act, other fair housing and civil rights related programs such as Title VI of the Civil Rights Act of 1964; Age Discrimination Act of 1975; Title II ADA; Section 3 of the HCD Act of 1968; Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act; and the Architectural Barriers Act of 1968. The CDBG Grant Agreement between HUD and the City of Glendale requires that the City comply with HUD’s administrative requirements listed above and any other requirements for CDBG-assisted activities.

### 6. Other Items: Community Participation in Planning Process

Community stakeholders including residents, business owners, elected officials, community groups, and municipal departments provided public input guiding the development of the City’s Comprehensive Plan, Parks and Recreation Plan, and Long-Range Transportation Plan. The City utilized several methods to inform the community about the Plans including distribution of flyers and advertisements. It seems that it is the City’s practice to seek public input in the planning, and development of plans that impact the community. However, the exact composition of such groups has to be verified. The City is encouraged to continue with citizen participation activities, and that such activities continue to include persons from all racial, ethnic, and religious groups along with persons with disabilities.

## Zoning Code

Another area where laws and regulations can have a disparate impact on the protected classes is zoning ordinances. Tisdale notes that *“Racially segregated residential patterns have been maintained through such government practices as zoning and land use regulation, legislation, court decisions, and numerous documented acts of commission and omission. A noteworthy example of governmental culpability is present-day segregated public housing projects. By maintaining the segregated residential patterns of low-income and minority households, these projects permanently relegate Black public housing residents to designated “Black” areas of the community.”*<sup>9</sup>

Zoning ordinances are enforceable in courts of law by the local community and therefore warrant even closer attention to help ensure that the ordinances help the community “affirmatively further fair housing” and do not either intentionally or unintentionally, serve as “impediments to the exercise of fair housing choice”. The City of Glendale’s Zoning Ordinance No. 1772 was adopted on September 1993 and applies to all City of Glendale’s boundaries.

The purposes of the Zoning Ordinance of the City of Glendale are to:

- a. Establish land use classifications dividing the city into various zoning districts.
- b. Provide regulations, prohibitions, and restrictions for the promotion of health, safety, convenience, aesthetics, and welfare.
- c. Govern the use of land for residential, commercial, office, industrial, and other uses.
- d. Regulate and limit the height and bulk of buildings and other structures.
- e. Limit the occupancy and size of yards and open spaces.
- f. Establish performance and design standards.
- g. Establish boards and commissions and define the powers of each.
- h. Provide procedures for changing zoning districts and standards which govern those districts, use permits, variances, and all other permits required by this Zoning Ordinance.
- i. Prescribe penalties for violations of the ordinance and repeal all ordinances in conflict.

The Zoning Ordinance review covered key areas that have an impact on fair housing choice including zoning, building regulations, accessibility standards, and other policies and practices. The following four subject areas were selected to be reviewed:

- Minimum Lot Size for Single Family Residential
- Multi-Family Maximum Structure Height and Densities
- Definition of Family
- Special Needs Housing
- Multi-Family Maximum Structure Height and Densities
- Group Living Facilities

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<sup>9</sup> William Tisdale. 1999. ["Fair Housing Strategies for the Future: A Balanced Approach,"](http://www.huduser.org/portal/Periodicals/CITYSCPE/VOL4NUM3/tisdale.pdf) *Cityscape: A Journal of Policy Development and Research* 4:3, 149, Cityscape, page 147. Accessed March 30, 2015.  
<http://www.huduser.org/portal/Periodicals/CITYSCPE/VOL4NUM3/tisdale.pdf>

- Other Comments

1. Minimum Lot Size for Single Family Residential

There are several residential zoning districts in the City of Glendale including Agricultural (A-1), Rural Residence (RR-90, RR-45), Suburban Residence (SR-30, SR-17, and SR-12), Urban Single-Residence (R1-10, R1-8, R1-7, R1-6, and R1-4), Mixed Residence (R-2) and Multiple Residence (R-3, R-4, and R-5).

According to the Zoning Ordinance, the Urban Single-Residence Districts are intended to provide for the protection of the established neighborhoods, development of a variety of single residence detached dwellings, and for certain neighborhood facilities such as churches and schools, which are related, incidental, and not detrimental to the residential environment. The Suburban Residential Single-Residence districts seek to encourage and preserve low density residential uses. The intent is to also reduce land use conflicts between urban and agriculture by providing a transition in intensity between rural and urban residential uses. The Agricultural District purpose is to accommodate semi-rural or vacant lands which may be suitable for interim agricultural uses and provides for single- residences, with one (1) detached single residence per lot.

Table 39 provides a summary of the Zoning Ordinance and identifies the Single- Residence Districts Development Standards by the minimum lot area, minimum lot width, maximum height, and other development regulations by zoning district.

It is important to consider lot size because minimum lot sizes impact affordability and may affect members of the protected classes. Typically, smaller lot sizes provide more opportunities for low-and moderate-income households to purchase or rent affordable housing. Larger lot sizes inflate housing prices due to high land costs. Ultimately, large lot sizes may lead to a decrease in the supply of affordable housing since the increased costs are passed on to the property owner or resident. As noted previously, while “income” is not a protected class under the FHA, protected class members are overrepresented in low-and moderate-income categories.

*Table 39. Single Residence Districts Development Standards - Glendale AZ*

District	Minimum Net Lot Area	Minimum Width	Minimum Depth	Maximum Structure Height <sup>1</sup>
A-1	40 acres	N/A	N/A	30
RR-90	90,000sq.ft	175	275	30
RR-45	45,000sq.ft.	125	200	30
SR-30	30,000sq.ft.	125	175	30
SR-17	17,000sq.ft.	110	130	30
SR-12	12,000sq.ft	100	120	30

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District	Minimum Net Lot Area	Minimum Width	Minimum Depth	Maximum Structure Height <sup>1</sup>
R1-10	10,000sq.ft.	90	100	30
R1-8	8,000sq.ft.	80	100	30
R1-7	7,000sq.ft.	70	100	30
R1-6	6,000sq.ft.	60	100	30
R1-4	4,000sq.ft.	40	80	30

Source: City of Glendale Zoning Ordinance  
1--Two story maximum for principal buildings

### 1. Multi-Family Max Structure

The Multiple Residence districts provide a transition from Urban Single- Residence Districts to a mixture of residential land uses, which includes low, medium and high density urban residential development. The districts allow a variety of building types, including single- family, apartments, town houses, condominiums, and clustered housing. The maximum height for residential zoning is 30 feet with the exception of the R-5 district which has a maximum height of 48 feet and the A-1 zoning district which has no height limit. Table 40 provides density and dimensional standards for Multiple Residence Districts in the City of Glendale, and is listed below.

Agricultural and semi-rural density ranges between 0 to 2.5 dwellings per acre; suburban density range between 2.5 to 5.0 dwellings per acre; medium density residential ranges between 5.0 to 12.0 dwelling units per acre; and the high density residential category designation provides for a density range between 12.0 to 30.0 dwellings per acre.

The City's Zoning Ordinance provides for the development of "nonconforming lots, which do not conform to lot area, lot width, or lot depth for the zoning district in which it is located and may be used for any use permitted in the zoning district provided all other applicable zoning regulations are complied with". These lots can be used for infill housing that would capitalize on existing infrastructure, eliminate vacant or blighted parcels, and provide affordable housing such as single- family housing units.

*Table 40. Multiple Residence Districts Development Standards*

District	Minimum Net Lot Area	Minimum Width	Minimum Depth	Maximum Structure Height <sup>2</sup>
R-2	10,000sq.ft.	60	94	30 <sup>1</sup>
R-3	6,000sq.ft.	60	94	30
R-4	6,000sq.ft.	60	94	30 <sup>1</sup>
R-5	43,560sq.ft.	N/A	N/A	48 <sup>2</sup>

1---Two story maximum for principal building      2---Four story maximum for principal buildings

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According to the Zoning Ordinance, the parcel area required per unit decreases with the increase in number of dwelling unit in the R-3 and R-4 multi residence zoning districts. The required area per dwelling unit is detailed below.

1 Residential unit	5,000 sq. feet per unit
2---4 Residential units	4,000sq. feet add./unit
5---8 Residential units	3,500 sq. feet add./unit
9 or more Residential units	2,175 sq. feet add./unit in R-3 2,700 sq. feet add./unit in R-4

Parcels of five (5) acres or larger must be at a maximum density of twenty (20) dwelling units per gross acres.

The City's Zoning Ordinance, by allowing development of "non-conforming" lots, provides an avenue for the development of affordable housing units. The City also has a program in which it works with Habitat for Humanity to redevelop City-owned and privately-owned infill vacant lots.

### 3. Definition of "Family"

The Fair Housing Act requires that groups of unrelated persons be treated equally as families and held to the same regulatory requirements. According to the City's Planning Department, the City's definition of "family" in the Zoning Ordinance does not have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement.

### 4. Special Needs Housing

The City indicated in the questionnaire that the Zoning Ordinance contains a definition for disability that is consistent with the FHA. The Ordinance does not restrict housing opportunities for individuals with disabilities onsite housing supporting services. The City allows persons with disabilities to make reasonable modifications or provides reasonable accommodation for persons with disabilities who live in municipal-supplied or managed residential housing. There are no areas in the jurisdiction described as exclusive under the Zoning Code.

One of the areas in which there is the potential to impact fair housing choice is requiring public hearings to obtain public input for special exceptions to zoning and land use rules for special needs housing. The City's Zoning Ordinance does not require different public hearing for exceptions for special needs housing.

The City's residential use types include group residential and retirement residences. The civic use types include group care facilities and group homes. The definitions of each of these uses are provided below:

**A Group Home** is defined as a "long- term residential care service functioning as a single housekeeping unit providing meals, supervision, and other support services for not more than ten (10) elderly, physically, emotionally, and developmentally disabled individuals not related to the owner/manager of the group home. A Supervisory Care facility is a Group Home with eleven (11) or more residents and is included in multi-residence districts.



**Adult Care Facilities** are defined as a long-term residential care services, licensed by the State Department of Health Services functioning as a single housekeeping unit in an environment in which staff persons provide supervision, personal care, meals, education, and participation in community activities of not more than ten (10) adult residents who are unrelated to the manager or owner of the adult care home and who require the assistance of not more than one (1) person to walk to or transfer from a bed, chair, or toilet, but who are able to self-propel a wheelchair. An Adult Care Home does not include Group Homes for the disabled, nursing homes, shelter facilities, medical institutional use, alcohol, or drug treatment centers, or community correctional facilities.

**Disabled:** A person who (1) has a physical or mental impairment that substantially limits one or more of such person's major life activities so that the person is incapable of living independently; (2) has a record of having such an impairment; or (3) is regarded as having such an impairment. However, disabled shall not include current illegal use of, or addiction to, controlled substances (as defined in Section 102 of the Controlled Substance Act [21 U.S.C. §802], nor shall it include any person whose residency in a Group Home would constitute a direct threat to the health or safety of other individuals or would result in substantial physical damage to the property of others.

**Group Homes for Persons with Disabilities:** A dwelling shared, as their primary residence, by at least six (6) but not more than ten (10) handicapped or disabled persons who are not related to the owner or manager of the group home for the disabled and who reside together as a single housekeeping unit, in which staff persons may provide supervision, personal care, meals, education, participation in community activities, counseling, treatment or therapy for the residents, and which may be licensed by, certified by, registered with, or otherwise authorized, funded or regulated, in whole or in part by an agency of the state or federal government.

Adult Care Homes and Group Homes for persons with disabilities are permitted in all of the City of Glendale's zoning districts subject to administrative review.

## 5. Other Comments

**Off-Street Parking:** Article 7 of the Zoning Ordinance provides off-street parking regulations for developments in the City. Table 41 provides the minimum off-street parking requirements by use. The minimum parking requirements for single-family structures is two spaces per dwelling unit. Multi-family residents are required to have 1 space per studio or 1-bedroom unit and two spaces per unit with two or more bedrooms. The Zoning Ordinance also addresses parking for people with disabilities. The design criteria require that accessible spaces be designed in compliance with the standards of the Americans with Disabilities Act (ADA).

*Table 41. Minimum Off-Street Parking Requirements by Use*

USE	MINIMUM # OF SPACES	MAXIMUM # OF SPACES
Residential Single –family	2:unit-1 covered	no maximum
Multi-family Studio or 1-bedroom	1 space	no maximum

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USE	MINIMUM # OF SPACES	MAXIMUM # OF SPACES
2 or more bedrooms 1 Designated guest space for every 3 units	2 spaces	no maximum no maximum
Retirement /Senior Housing/ Convalescent/Nursing/Congregate Care Home	.4:unit	No maximum

### Building Codes

Building and construction codes represent another set of regulations that have the potential to impact fair housing choice, especially for persons with physical disabilities for whom accessibility is important. As noted in the HUD publication, *Affordable Housing: Streamlining Local Regulations*, “A Handbook for Reducing Housing and Development Costs,” there are generally two categories of codes usually imposed at the state or local level that pertain to buildings. These two categories generally cover a) building construction, and b) building maintenance and use. Local jurisdictions such as the City of Glendale adopt building or construction codes to regulate building safety and other standards for residential and commercial buildings. These codes are enforced through a permitting and inspection system which authorizes a specific governmental unit, typically a building department, to set fees and carry out actions. The City’s Building Safety Department is the agency responsible for building code compliance.

The building codes used by a city are not required to include or enforce federal accessibility requirements. The responsibility of ensuring that federal accessibility requirements are included in residential projects are left to the developers, designers, and operators of such buildings. State and local accessibility requirements must be enforced by the local governmental unit such as the City of Glendale. Many local jurisdictions adapt federal accessibility requirements within their building codes on a voluntary basis thereby improving the availability of accessible housing choices for persons with disabilities. The FHA and the American with Disabilities Act (ADA) has design and accessibility standards which are outlined elsewhere in this document but does not have a permitting and plan review process for enforcement. However, the issuance of a certificate of completion and building permits by the City’s building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

The City of Glendale has adopted the 2012 International Building Code (IBC) as amended, Chapter 11 relating to accessibility, the 2009 International Code Council (ICC)/American National Standard Institute (ANSI) A 117.1 *Accessible and Usable Building and Facilities*;<sup>10</sup> as well as incorporating the provisions of the ADA (28 CFR Part 35, and 28 CFR 36); the 2010 *Americans with Disabilities Act Standards for Accessible Design*; and the *Fair Housing Accessibility Guidelines*. Amendments were made to the Code of Ordinances at 9-16 requiring that in the event of a conflict between IBC provisions and federal accessibility standards, the federal standards would be primary.

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<sup>10</sup> Source - Glendale Code of Ordinances Chapter 9 - Buildings and Building Regulations (effective Dec. 1, 2012)

## **IV. COMPLIANCE DATA AND ANALYSIS**

### **Introduction**

This section contains an analysis of home loan, community reinvestment, and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist.

### **CRA Compliance**

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The Community Reinvestment Act (CRA) requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. CRA examinations are conducted by the Federal Financial Institutions Examinations Council (FFIEC) of federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS).

The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- \* Outstanding
- \* Satisfactory
- \* Needs to Improve
- \* Substantial Noncompliance

Four CRA Performance Ratings have been given to banks based within the city limits of Glendale, Arizona. (It should be noted that a bank may have been rated more than once during this time period.) All four bank examinations received a rating of "Satisfactory." No institutions received a rating of "Needs to Improve" or "Substantial Noncompliance." All examinations and ratings are illustrated below, in alphabetical order, by bank/institution name.

*Table 42. FFIEC CRA Performance Ratings- Glendale, AZ*

<b>Exam Date</b>	<b>Bank Name*</b>	<b>City</b>	<b>State</b>	<b>FFIEC CRA Rating</b>	<b>Asset Size (in thousands)</b>
<b>2/1/2003</b>	Arrowhead Community Bank	Glendale	AZ	Satisfactory	\$43,556
<b>7/5/2008</b>	Arrowhead Community Bank	Glendale	AZ	Satisfactory	\$89,346
<b>4/3/2012</b>	BNC National Bank	Glendale	AZ	Satisfactory	\$739,686
<b>12/1/2005</b>	Cactus Commerce Bank	Glendale	AZ	Satisfactory	\$24,215

\*Institutions whose physical headquarters are in the City of Glendale, AZ  
Source: FDIC, <http://www.ffiec.gov/craratings>

In addition, the FFIEC publishes annual Census Reports that use a limited number of demographic, income, population, and housing data from the FFIEC's Census files prepared from HMDA and CRA data. The FFIEC updates the Census Windows Application annually to include income estimates developed by the FFIEC and include CRA distressed/underserved tracts as announced by the federal bank regulatory agencies. These reports were gathered from the FFIEC for Maricopa County, Arizona (the county containing the City of Glendale). These reports were gathered from the FFIEC for the Census Tracts (or parts) fully or partially within the City of Glendale.

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Table 43. FFIEC Census Report: Summary Census Demographic Information - Maricopa County, AZ

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
610.11	Middle	No	97.61	\$61,900	\$60,421	\$62,869	5705	52.36	2987	1078	1881
610.43	Middle	No	117.19	\$61,900	\$72,541	\$75,481	2452	53.26	1306	518	660
610.44	Upper	No	122.21	\$61,900	\$75,648	\$78,717	5553	35.19	1954	1160	1506
610.45	Upper	No	129.21	\$61,900	\$79,981	\$83,226	4960	24.31	1206	1274	1511
610.46	Middle	No	113.51	\$61,900	\$70,263	\$73,110	5183	54.04	2801	1189	1542
610.47	Upper	No	161.33	\$61,900	\$99,863	\$103,914	3264	42.74	1395	803	1005
611.00	Moderate	No	63.03	\$61,900	\$39,016	\$40,601	3436	39.06	1342	0	599
715.09	Upper	No	155.06	\$61,900	\$95,982	\$99,877	5401	24.59	1328	1231	1531
715.10	Upper	No	155.61	\$61,900	\$96,323	\$100,229	4078	20.77	847	1176	1336
715.11	Middle	No	83.02	\$61,900	\$51,389	\$53,472	3339	25.43	849	813	1238
715.12	Middle	No	103.13	\$61,900	\$63,837	\$66,429	5917	25.93	1534	1790	2124
715.14	Middle	No	114.07	\$61,900	\$70,609	\$73,472	4021	24.57	988	1077	1288
719.03	Middle	No	86.51	\$61,900	\$53,550	\$55,723	6306	33.19	2093	1755	2364
719.15	Middle	No	81.91	\$61,900	\$50,702	\$52,763	3439	43.04	1480	1042	1340
820.02	Middle	No	80.58	\$61,900	\$49,879	\$51,901	5807	59.93	3480	1203	1711
820.07	Moderate	No	74.36	\$61,900	\$46,029	\$47,894	4077	78.54	3202	941	1247
820.08	Middle	No	84.56	\$61,900	\$52,343	\$54,464	5058	86.26	4363	955	1522
820.16	Middle	No	108.01	\$61,900	\$66,858	\$69,571	2348	71.04	1668	431	741
923.05	Middle	No	92.31	\$61,900	\$57,140	\$59,457	3667	36.68	1345	1252	1479
923.06	Middle	No	101.96	\$61,900	\$63,113	\$65,676	5893	35.94	2118	1765	2176
923.07	Middle	No	96.82	\$61,900	\$59,932	\$62,361	5847	46.54	2721	1592	2095
923.08	Middle	No	93.48	\$61,900	\$57,864	\$60,213	6612	42.41	2804	1630	2024
923.09	Middle	No	107.65	\$61,900	\$66,635	\$69,340	5212	39.14	2040	1701	1745
923.11	Moderate	No	65.55	\$61,900	\$40,575	\$42,225	2876	58.41	1680	253	561
923.12	Moderate	No	52.36	\$61,900	\$32,411	\$33,726	5001	45.23	2262	765	1052
924.01	Moderate	No	66.03	\$61,900	\$40,873	\$42,530	4045	61.33	2481	666	1081
924.02	Moderate	No	75.72	\$61,900	\$46,871	\$48,770	3369	52.15	1757	860	1060
925.00	Moderate	No	58.82	\$61,900	\$36,410	\$37,885	4935	62.72	3095	915	1646
926.00	Low	No	49.76	\$61,900	\$30,801	\$32,052	3177	70.16	2229	645	1186
927.05	Middle	No	86.4	\$61,900	\$53,482	\$55,653	3702	70.85	2623	584	1116
927.10	Middle	No	110.88	\$61,900	\$68,635	\$71,419	4269	52.89	2258	1222	1534
927.11	Middle	No	80.59	\$61,900	\$49,885	\$51,908	3120	61.22	1910	606	1048
927.12	Middle	No	83.22	\$61,900	\$51,513	\$53,603	4905	69.48	3408	985	1188
927.13	Middle	No	105.32	\$61,900	\$65,193	\$67,836	5027	73.62	3701	1139	1502
927.15	Moderate	No	78.74	\$61,900	\$48,740	\$50,721	4037	77.21	3117	651	1049
927.16	Middle	No	89.61	\$61,900	\$55,469	\$57,717	3908	76.54	2991	984	1212



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Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
927.17	Moderate	No	63.54	\$61,900	\$39,331	\$40,929	4870	80.23	3907	561	730
927.18	Moderate	No	61.48	\$61,900	\$38,056	\$39,604	3791	79.72	3022	389	700
927.19	Middle	No	99.22	\$61,900	\$61,417	\$63,908	4277	58.62	2507	718	901
927.20	Middle	No	95.54	\$61,900	\$59,139	\$61,540	4407	47.33	2086	875	1097
927.21	Upper	No	124.98	\$61,900	\$77,363	\$80,500	2801	52.41	1468	673	905
928.01	Low	No	44.49	\$61,900	\$27,539	\$28,657	4756	85.91	4086	336	1281
928.02	Low	No	47.72	\$61,900	\$29,539	\$30,741	5217	83.84	4374	673	1154
929.00	Low	No	38.81	\$61,900	\$24,023	\$25,000	2866	88.97	2550	445	936
930.01	Moderate	No	67.22	\$61,900	\$41,609	\$43,297	4841	68.99	3340	910	1364
930.02	Low	No	44.81	\$61,900	\$27,737	\$28,864	4082	73.37	2995	557	1194
931.01	Low	No	46.57	\$61,900	\$28,827	\$30,000	4547	73.04	3321	855	1206
931.04	Low	No	34.63	\$61,900	\$21,436	\$22,305	4385	77.63	3404	489	800
931.05	Low	No	44.46	\$61,900	\$27,521	\$28,638	5242	78.33	4106	560	929
931.06	Middle	No	87.8	\$61,900	\$54,348	\$56,552	4068	76.92	3129	807	1115
932.00	Moderate	No	57.5	\$61,900	\$35,593	\$37,037	3355	62.47	2096	484	820
1042.14	Middle	No	119.53	\$61,900	\$73,989	\$76,992	2312	18.94	438	601	776
1042.15	Middle	No	92.37	\$61,900	\$57,177	\$59,500	4026	23.82	959	1110	1441
1042.16	Middle	No	93.43	\$61,900	\$57,833	\$60,179	4771	26.68	1273	1222	1530
1042.17	Middle	No	111.09	\$61,900	\$68,765	\$71,552	4882	26.59	1298	1445	1719
1042.21	Middle	No	110.51	\$61,900	\$68,406	\$71,182	5864	33.44	1961	1544	2030
1042.22	Middle	No	107.71	\$61,900	\$66,672	\$69,375	5915	30.3	1792	1343	1704
1042.24	Upper	No	134.66	\$61,900	\$83,355	\$86,738	5898	30.99	1828	1340	1502
1042.27	Middle	No	106.96	\$61,900	\$66,208	\$68,895	2059	36.72	756	549	620
1094.00	Moderate	No	63.37	\$61,900	\$39,226	\$40,818	8290	83.51	6923	1101	1753
1095.00	Moderate	No	77.9	\$61,900	\$48,220	\$50,179	4867	80.95	3940	1037	1409
1096.01	Moderate	No	62.74	\$61,900	\$38,836	\$40,411	4723	81.35	3842	747	1127
1096.02	Moderate	No	52.57	\$61,900	\$32,541	\$33,864	5719	87.04	4978	860	1454
1096.03	Moderate	No	76.97	\$61,900	\$47,644	\$49,577	4450	83.39	3711	932	1263
1096.04	Moderate	No	57.73	\$61,900	\$35,735	\$37,188	3814	81.46	3107	649	939
6112.00	Upper	No	187.6	\$61,900	\$116,124	\$120,833	5911	21.62	1278	1587	1864
6139.00	Upper	No	132.97	\$61,900	\$82,308	\$85,649	6154	19.43	1196	1756	2003
6140.00	Upper	No	160.23	\$61,900	\$99,182	\$103,202	4398	17.39	765	1336	1601
6141.00	Upper	No	146.36	\$61,900	\$90,597	\$94,271	5724	22.47	1286	1399	1787
6142.00	Upper	No	175.57	\$61,900	\$108,678	\$113,085	4891	17.19	841	1733	1885
6143.00	Upper	No	156.82	\$61,900	\$97,072	\$101,010	3124	18.79	587	1149	1364
6156.00	Middle	No	102.59	\$61,900	\$63,503	\$66,082	3776	11.47	433	1408	2006
6157.00	Upper	No	162.38	\$61,900	\$100,513	\$104,592	2991	16.85	504	1027	1244
6158.00	Upper	No	146.99	\$61,900	\$90,987	\$94,676	4906	16.65	817	1449	1925

# Analysis of Impediments to Fair Housing Choice, April 2015

## City of Glendale, AZ

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
6159.00	Upper	No	156.38	\$61,900	\$96,799	\$100,726	4362	22.51	982	840	1006
6160.00	Upper	No	135.28	\$61,900	\$83,738	\$87,137	2237	25.35	567	453	509
6176.00	Upper	No	125.47	\$61,900	\$77,666	\$80,818	6106	21.8	1331	1095	1717
6177.00	Middle	No	84.05	\$61,900	\$52,027	\$54,141	3318	35.32	1172	227	401
6178.00	Upper	No	141.95	\$61,900	\$87,867	\$91,429	2613	14.16	370	852	963
6179.00	Middle	No	100.44	\$61,900	\$62,172	\$64,693	2691	17.17	462	886	931
6180.00	Upper	No	144.26	\$61,900	\$89,297	\$92,917	4555	23.97	1092	1370	1625

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

*Table 44. FFIEC Census Report: Summary Census Income Information – Maricopa County, AZ*

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
610.11	Middle	\$64,408	\$61,900	27.39	97.61	\$62,869	\$60,421	\$51,433
610.43	Middle	\$64,408	\$61,900	8.68	117.19	\$75,481	\$72,541	\$66,944
610.44	Upper	\$64,408	\$61,900	0.69	122.21	\$78,717	\$75,648	\$79,243
610.45	Upper	\$64,408	\$61,900	7.22	129.21	\$83,226	\$79,981	\$78,597
610.46	Middle	\$64,408	\$61,900	9.8	113.51	\$73,110	\$70,263	\$61,162
610.47	Upper	\$64,408	\$61,900	13.3	161.33	\$103,914	\$99,863	\$103,322
611.00	Moderate	\$64,408	\$61,900	0.66	63.03	\$40,601	\$39,016	\$40,601
715.09	Upper	\$64,408	\$61,900	3.81	155.06	\$99,877	\$95,982	\$81,444
715.10	Upper	\$64,408	\$61,900	5.02	155.61	\$100,229	\$96,323	\$98,879
715.11	Middle	\$64,408	\$61,900	9.57	83.02	\$53,472	\$51,389	\$50,435
715.12	Middle	\$64,408	\$61,900	3.41	103.13	\$66,429	\$63,837	\$62,685
715.14	Middle	\$64,408	\$61,900	0.18	114.07	\$73,472	\$70,609	\$68,179
719.03	Middle	\$64,408	\$61,900	10.42	86.51	\$55,723	\$53,550	\$54,933
719.15	Middle	\$64,408	\$61,900	10.46	81.91	\$52,763	\$50,702	\$48,713
820.02	Middle	\$64,408	\$61,900	11.87	80.58	\$51,901	\$49,879	\$49,618
820.07	Moderate	\$64,408	\$61,900	12.29	74.36	\$47,894	\$46,029	\$47,642
820.08	Middle	\$64,408	\$61,900	7.09	84.56	\$54,464	\$52,343	\$53,368
820.16	Middle	\$64,408	\$61,900	23.53	108.01	\$69,571	\$66,858	\$75,859
923.05	Middle	\$64,408	\$61,900	8.86	92.31	\$59,457	\$57,140	\$55,000
923.06	Middle	\$64,408	\$61,900	5.59	101.96	\$65,676	\$63,113	\$55,540
923.07	Middle	\$64,408	\$61,900	6.39	96.82	\$62,361	\$59,932	\$59,586
923.08	Middle	\$64,408	\$61,900	16.59	93.48	\$60,213	\$57,864	\$44,273
923.09	Middle	\$64,408	\$61,900	5.6	107.65	\$69,340	\$66,635	\$51,929

# Analysis of Impediments to Fair Housing Choice, April 2015

## City of Glendale, AZ

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
923.11	Moderate	\$64,408	\$61,900	30.1	65.55	\$42,225	\$40,575	\$25,833
923.12	Moderate	\$64,408	\$61,900	21.57	52.36	\$33,726	\$32,411	\$26,807
924.01	Moderate	\$64,408	\$61,900	19.44	66.03	\$42,530	\$40,873	\$38,015
924.02	Moderate	\$64,408	\$61,900	17.19	75.72	\$48,770	\$46,871	\$36,563
925.00	Moderate	\$64,408	\$61,900	19.32	58.82	\$37,885	\$36,410	\$34,571
926.00	Low	\$64,408	\$61,900	27.74	49.76	\$32,052	\$30,801	\$28,787
927.05	Middle	\$64,408	\$61,900	10.41	86.4	\$55,653	\$53,482	\$50,609
927.10	Middle	\$64,408	\$61,900	14.38	110.88	\$71,419	\$68,635	\$64,516
927.11	Middle	\$64,408	\$61,900	28.1	80.59	\$51,908	\$49,885	\$50,169
927.12	Middle	\$64,408	\$61,900	14.1	83.22	\$53,603	\$51,513	\$52,500
927.13	Middle	\$64,408	\$61,900	4.84	105.32	\$67,836	\$65,193	\$65,136
927.15	Moderate	\$64,408	\$61,900	19.54	78.74	\$50,721	\$48,740	\$44,688
927.16	Middle	\$64,408	\$61,900	10.21	89.61	\$57,717	\$55,469	\$52,273
927.17	Moderate	\$64,408	\$61,900	21.17	63.54	\$40,929	\$39,331	\$45,955
927.18	Moderate	\$64,408	\$61,900	33.25	61.48	\$39,604	\$38,056	\$41,228
927.19	Middle	\$64,408	\$61,900	8.85	99.22	\$63,908	\$61,417	\$48,944
927.20	Middle	\$64,408	\$61,900	18.12	95.54	\$61,540	\$59,139	\$51,023
927.21	Upper	\$64,408	\$61,900	6.56	124.98	\$80,500	\$77,363	\$88,221
928.01	Low	\$64,408	\$61,900	56.35	44.49	\$28,657	\$27,539	\$28,463
928.02	Low	\$64,408	\$61,900	28.87	47.72	\$30,741	\$29,539	\$26,670
929.00	Low	\$64,408	\$61,900	44.82	38.81	\$25,000	\$24,023	\$23,872
930.01	Moderate	\$64,408	\$61,900	32.47	67.22	\$43,297	\$41,609	\$42,556
930.02	Low	\$64,408	\$61,900	25.21	44.81	\$28,864	\$27,737	\$32,095
931.01	Low	\$64,408	\$61,900	46.42	46.57	\$30,000	\$28,827	\$29,345
931.04	Low	\$64,408	\$61,900	45.86	34.63	\$22,305	\$21,436	\$20,810
931.05	Low	\$64,408	\$61,900	29.86	44.46	\$28,638	\$27,521	\$30,851
931.06	Middle	\$64,408	\$61,900	26.61	87.8	\$56,552	\$54,348	\$51,031
932.00	Moderate	\$64,408	\$61,900	29.26	57.5	\$37,037	\$35,593	\$35,000
1042.14	Middle	\$64,408	\$61,900	7.07	119.53	\$76,992	\$73,989	\$53,182
1042.15	Middle	\$64,408	\$61,900	9.54	92.37	\$59,500	\$57,177	\$50,816
1042.16	Middle	\$64,408	\$61,900	8.87	93.43	\$60,179	\$57,833	\$50,398
1042.17	Middle	\$64,408	\$61,900	12.05	111.09	\$71,552	\$68,765	\$57,910
1042.21	Middle	\$64,408	\$61,900	12	110.51	\$71,182	\$68,406	\$64,026
1042.22	Middle	\$64,408	\$61,900	11.55	107.71	\$69,375	\$66,672	\$62,992
1042.24	Upper	\$64,408	\$61,900	11.17	134.66	\$86,738	\$83,355	\$62,306
1042.27	Middle	\$64,408	\$61,900	11.88	106.96	\$68,895	\$66,208	\$66,048
1094.00	Moderate	\$64,408	\$61,900	28.68	63.37	\$40,818	\$39,226	\$32,420
1095.00	Moderate	\$64,408	\$61,900	25.94	77.9	\$50,179	\$48,220	\$46,812
1096.01	Moderate	\$64,408	\$61,900	27.72	62.74	\$40,411	\$38,836	\$40,161

# Analysis of Impediments to Fair Housing Choice, April 2015

## City of Glendale, AZ

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2014 Est. Tract Median Family Income	2010 Tract Median Household Income
1096.02	Moderate	\$64,408	\$61,900	28.93	52.57	\$33,864	\$32,541	\$33,937
1096.03	Moderate	\$64,408	\$61,900	9.71	76.97	\$49,577	\$47,644	\$51,566
1096.04	Moderate	\$64,408	\$61,900	33.51	57.73	\$37,188	\$35,735	\$34,571
6112.00	Upper	\$64,408	\$61,900	0.87	187.6	\$120,833	\$116,124	\$112,581
6139.00	Upper	\$64,408	\$61,900	4.81	132.97	\$85,649	\$82,308	\$83,733
6140.00	Upper	\$64,408	\$61,900	2.89	160.23	\$103,202	\$99,182	\$99,063
6141.00	Upper	\$64,408	\$61,900	1.6	146.36	\$94,271	\$90,597	\$88,097
6142.00	Upper	\$64,408	\$61,900	4.91	175.57	\$113,085	\$108,678	\$105,000
6143.00	Upper	\$64,408	\$61,900	5.83	156.82	\$101,010	\$97,072	\$102,917
6156.00	Middle	\$64,408	\$61,900	7.42	102.59	\$66,082	\$63,503	\$61,973
6157.00	Upper	\$64,408	\$61,900	3.9	162.38	\$104,592	\$100,513	\$92,386
6158.00	Upper	\$64,408	\$61,900	3.7	146.99	\$94,676	\$90,987	\$84,881
6159.00	Upper	\$64,408	\$61,900	6.61	156.38	\$100,726	\$96,799	\$68,125
6160.00	Upper	\$64,408	\$61,900	13.58	135.28	\$87,137	\$83,738	\$84,583
6176.00	Upper	\$64,408	\$61,900	4.8	125.47	\$80,818	\$77,666	\$60,776
6177.00	Middle	\$64,408	\$61,900	17.88	84.05	\$54,141	\$52,027	\$44,250
6178.00	Upper	\$64,408	\$61,900	5.91	141.95	\$91,429	\$87,867	\$91,739
6179.00	Middle	\$64,408	\$61,900	6.13	100.44	\$64,693	\$62,172	\$63,300
6180.00	Upper	\$64,408	\$61,900	4.92	144.26	\$92,917	\$89,297	\$74,329

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

*Table 45. FFIEC Census Report: Summary Census Population Information – Maricopa County, AZ*

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
610.11	5705	52.36	1461	1818	2718	2987	46	309	551	1904	177
610.43	2452	53.26	496	584	1146	1306	19	42	117	1063	65
610.44	5553	35.19	1083	1261	3599	1954	20	183	322	1309	120
610.45	4960	24.31	1176	1503	3754	1206	18	73	85	970	60
610.46	5183	54.04	1293	2111	2382	2801	35	187	479	1908	192
610.47	3264	42.74	933	951	1869	1395	17	284	273	751	70
611.00	3436	39.06	552	552	2094	1342	27	155	456	543	161
715.09	5401	24.59	1189	1703	4073	1328	32	202	196	772	126
715.10	4078	20.77	1153	1286	3231	847	13	175	107	502	50
715.11	3339	25.43	821	1266	2490	849	20	174	92	505	58
715.12	5917	25.93	1740	2010	4383	1534	50	171	171	1008	134
715.14	4021	24.57	1003	1557	3033	988	15	135	151	588	99
719.03	6306	33.19	1631	2318	4213	2093	48	68	164	1678	135
719.15	3439	43.04	838	1355	1959	1480	39	58	140	1160	83

# Analysis of Impediments to Fair Housing Choice, April 2015

## City of Glendale, AZ

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
820.02	5807	59.93	1489	2215	2327	3480	54	106	448	2717	155
820.07	4077	78.54	1091	1265	875	3202	46	43	186	2883	44
820.08	5058	86.26	1168	1335	695	4363	33	117	267	3867	79
820.16	2348	71.04	649	707	680	1668	11	172	197	1223	65
923.05	3667	36.68	1136	1528	2322	1345	33	109	137	992	74
923.06	5893	35.94	1672	2190	3775	2118	69	223	226	1477	123
923.07	5847	46.54	1519	2258	3126	2721	66	374	410	1754	117
923.08	6612	42.41	1730	2500	3808	2804	117	209	319	2029	130
923.09	5212	39.14	1136	2027	3172	2040	64	195	277	1434	70
923.11	2876	58.41	629	1196	1196	1680	71	76	285	1178	70
923.12	5001	45.23	1081	2274	2739	2262	110	267	484	1272	129
924.01	4045	61.33	1021	1671	1564	2481	94	93	340	1833	121
924.02	3369	52.15	730	1600	1612	1757	63	69	279	1233	113
925.00	4935	62.72	1360	1753	1840	3095	54	237	209	2492	103
926.00	3177	70.16	663	1063	948	2229	36	83	154	1918	38
927.05	3702	70.85	871	1147	1079	2623	77	268	389	1821	68
927.10	4269	52.89	1102	1404	2011	2258	73	122	277	1689	97
927.11	3120	61.22	915	1033	1210	1910	45	201	162	1439	63
927.12	4905	69.48	927	1324	1497	3408	34	180	476	2601	117
927.13	5027	73.62	1242	1413	1326	3701	74	235	338	2968	86
927.15	4037	77.21	905	1114	920	3117	54	102	274	2593	94
927.16	3908	76.54	932	1110	917	2991	38	59	199	2623	72
927.17	4870	80.23	1132	1502	963	3907	59	219	599	2951	79
927.18	3791	79.72	973	1149	769	3022	36	143	373	2384	86
927.19	4277	58.62	1194	1640	1770	2507	60	122	325	1863	137
927.20	4407	47.33	915	1609	2321	2086	48	138	275	1522	103
927.21	2801	52.41	686	768	1333	1468	16	365	187	789	111
928.01	4756	85.91	1054	1359	670	4086	62	39	268	3661	56
928.02	5217	83.84	1028	1449	843	4374	37	66	210	3982	79
929.00	2866	88.97	728	1180	316	2550	31	8	130	2359	22
930.01	4841	68.99	1325	1928	1501	3340	117	47	517	2517	142
930.02	4082	73.37	904	1316	1087	2995	82	104	409	2294	106
931.01	4547	73.04	936	1463	1226	3321	102	66	400	2683	70
931.04	4385	77.63	921	1500	981	3404	87	43	430	2732	112
931.05	5242	78.33	999	1761	1136	4106	79	20	343	3605	59
931.06	4068	76.92	830	1109	939	3129	31	60	274	2683	81
932.00	3355	62.47	748	1396	1259	2096	100	145	345	1413	93
1042.14	2312	18.94	591	782	1874	438	12	39	43	296	48
1042.15	4026	23.82	816	1560	3067	959	44	87	96	650	82
1042.16	4771	26.68	1464	2026	3498	1273	43	236	121	757	116



# Analysis of Impediments to Fair Housing Choice, April 2015

## City of Glendale, AZ

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
1042.17	4882	26.59	1190	2020	3584	1298	62	185	148	791	112
1042.21	5864	33.44	1551	2017	3903	1961	67	235	212	1315	132
1042.22	5915	30.3	1584	2208	4123	1792	88	182	256	1122	144
1042.24	5898	30.99	1495	2311	4070	1828	62	347	264	996	159
1042.27	2059	36.72	624	790	1303	756	13	35	109	551	48
1094.00	8290	83.51	1546	2263	1367	6923	106	57	463	6183	114
1095.00	4867	80.95	1068	1248	927	3940	47	70	255	3507	61
1096.01	4723	81.35	954	1232	881	3842	37	33	254	3453	65
1096.02	5719	87.04	1264	1656	741	4978	64	37	343	4456	78
1096.03	4450	83.39	1021	1182	739	3711	31	24	223	3362	71
1096.04	3814	81.46	669	972	707	3107	31	14	147	2870	4
6112.00	5911	21.62	1494	1775	4633	1278	14	345	154	619	146
6139.00	6154	19.43	1681	1971	4958	1196	9	313	97	642	135
6140.00	4398	17.39	1218	1491	3633	765	21	161	44	425	114
6141.00	5724	22.47	1356	1845	4438	1286	15	445	139	535	152
6142.00	4891	17.19	1478	1964	4050	841	16	273	97	375	80
6143.00	3124	18.79	1077	1223	2537	587	21	232	43	238	53
6156.00	3776	11.47	1365	1993	3343	433	6	68	74	232	53
6157.00	2991	16.85	841	1153	2487	504	14	101	82	267	40
6158.00	4906	16.65	1339	1804	4089	817	19	200	119	398	81
6159.00	4362	22.51	1086	1666	3380	982	8	330	117	439	88
6160.00	2237	25.35	435	567	1670	567	7	259	45	202	54
6176.00	6106	21.8	1456	2198	4775	1331	56	149	170	846	110
6177.00	3318	35.32	749	1540	2146	1172	39	364	150	487	132
6178.00	2613	14.16	762	898	2243	370	7	60	17	263	23
6179.00	2691	17.17	808	1103	2229	462	14	82	53	254	59
6180.00	4555	23.97	1233	1578	3463	1092	32	234	122	606	98

Source: Federal Financial Institutions Examination Council (FFIEC), Census Reports, 2014

Table 46. FFIEC Census Report – Summary Census Housing Information – Maricopa County, AZ

Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
610.11	1881	1881	8	Yes	1078	-	1078	740
610.43	660	660	8	No	518	-	518	66
610.44	1506	1506	5	No	1160	-	1160	101
610.45	1574	1511	13	No	1274	-	1263	229
610.46	2279	1542	9	No	1189	-	1189	922
610.47	1005	1005	0	No	803	-	803	148
611.00	612	599	26	No	0	-	0	552
715.09	1962	1531	12	No	1231	-	1231	472

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Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
715.10	1336	1336	20	No	1176	-	1176	110
715.11	1468	1238	14	No	813	-	813	453
715.12	2170	2124	23	No	1790	-	1773	220
715.14	1585	1288	14	No	1077	-	1077	480
719.03	2364	2364	25	No	1755	-	1755	563
719.15	1472	1340	26	No	1042	-	1042	313
820.02	2451	1711	24	Yes	1203	-	1198	1012
820.07	1352	1247	29	Yes	941	-	912	324
820.08	1549	1522	19	Yes	955	-	955	380
820.16	741	741	7	Yes	431	-	431	276
923.05	1528	1479	29	No	1252	-	1252	276
923.06	2387	2176	32	No	1765	-	1750	425
923.07	2492	2095	29	No	1592	-	1568	666
923.08	2648	2024	33	Yes	1630	-	1630	870
923.09	2060	1745	34	Yes	1701	-	1528	326
923.11	1465	561	30	No	253	-	253	943
923.12	2735	1052	26	No	765	-	683	1509
924.01	1928	1081	32	No	666	-	635	1005
924.02	1600	1060	31	Yes	860	-	860	740
925.00	1843	1646	35	No	915	-	915	838
926.00	1331	1186	36	No	645	-	632	418
927.05	1365	1116	14	No	584	-	584	563
927.10	1534	1534	17	No	1222	-	1222	182
927.11	1174	1048	15	No	606	-	606	427
927.12	1589	1188	15	No	985	-	985	339
927.13	1502	1502	15	No	1139	-	1139	274
927.15	1311	1049	28	No	651	-	651	463
927.16	1212	1212	32	No	984	-	984	126
927.17	1608	730	10	No	561	-	561	941
927.18	1299	700	26	No	389	-	389	760
927.19	1734	901	10	Yes	718	-	718	922
927.2	1758	1097	13	Yes	875	-	839	734
927.21	924	905	6	No	673	-	673	95
928.01	1766	1281	50	No	336	-	336	1023
928.02	1830	1154	38	No	673	-	625	776
929.00	1303	936	38	No	445	-	445	735
930.01	2336	1364	38	Yes	910	-	843	1018
930.02	1478	1194	40	Yes	557	-	543	759
931.01	1769	1206	32	Yes	855	-	835	608
931.04	1878	800	28	Yes	489	-	489	1011
931.05	2190	929	32	No	560	-	560	1201

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## City of Glendale, AZ

Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
931.06	1191	1115	48	No	807	-	807	302
932.00	1581	820	25	No	484	-	475	912
1042.14	854	776	34	Yes	601	-	601	181
1042.15	1761	1441	27	No	1110	-	1110	450
1042.16	2090	1530	26	No	1222	-	1222	804
1042.17	2103	1719	33	Yes	1445	-	1434	575
1042.21	2191	2030	30	Yes	1544	-	1487	473
1042.22	2337	1704	24	No	1343	-	1343	865
1042.24	2641	1502	23	Yes	1340	-	1264	971
1042.27	858	620	33	No	549	-	549	241
1094.00	2621	1753	42	Yes	1101	-	1101	1162
1095.00	1460	1409	39	Yes	1037	-	1037	211
1096.01	1458	1127	32	Yes	747	-	747	485
1096.02	1833	1454	33	Yes	860	-	836	796
1096.03	1263	1263	34	Yes	932	-	932	250
1096.04	1054	939	44	Yes	649	-	614	323
6112.00	1864	1864	0	Yes	1587	-	1587	188
6139.00	2003	2003	10	No	1756	-	1756	215
6140.00	1601	1601	0	No	1336	-	1336	155
6141.00	2257	1787	0	No	1399	-	1399	446
6142.00	1999	1885	0	No	1733	-	1724	231
6143.00	1364	1364	15	Yes	1149	-	1149	74
6156.00	2396	2006	14	No	1408	-	1408	585
6157.00	1244	1244	16	No	1027	-	1027	126
6158.00	2173	1925	21	No	1449	-	1418	355
6159.00	1914	1006	12	No	840	-	829	826
6160.00	593	509	15	Yes	453	-	453	114
6176.00	2588	1717	16	No	1095	-	1050	1103
6177.00	1820	401	15	No	227	-	227	1313
6178.00	963	963	27	No	852	-	852	46
6179.00	1147	931	17	No	886	-	875	217
6180.00	1625	1625	21	Yes	1370	-	1370	208

### **Fair Housing Complaint Data**

Fair housing complaints may be filed with the U.S. Department of Housing and Urban Development (HUD) or the Civil Rights Division of the Arizona Attorney General.

#### U.S. Department of Housing and Urban Development

Housing discrimination complaints filed with HUD may be done online at:

<http://www.hud.gov/complaints/housediscrim.cfm>. Complaint forms may also be obtained by calling or writing to the local HUD Fair Housing office at:

San Francisco FHEO Center  
600 Harrison Street  
Third Floor  
San Francisco, CA 94107  
(415) 489-6536 or (800) 347-3739

Housing discrimination complaints are reviewed by a fair housing specialist to determine if it alleges acts that might violate the Fair Housing Act. The specialist will contact the complainant for any additional information needed to complete this review. If the complaint involves a possible violation of the Fair Housing Act, the specialist assists with filing an official housing discrimination complaint.

When HUD receives a complaint, the department will notify the person who filed the complaint, then notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act. A complaint may be resolved in a number of ways. First, HUD attempts to reach an agreement between the two parties involved. If achieved, this "conciliation agreement" must lay out provisions to protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement is violated, in which case HUD will recommend that the Attorney General file suit. If a person needs immediate help to stop a serious problem being caused by a Fair Housing Act violation, HUD may assist as soon as a complaint is filed. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of the complaint, if irreparable harm is likely to occur without HUD's intervention and there is substantial evidence indicating a violation of the Fair Housing Act.

#### Arizona Attorney General

The Arizona Attorney General's Civil Rights Division is responsible for enforcing Arizona's Fair Housing Act. The Civil Rights Division's Litigation Section is responsible for enforcing the Arizona Civil Rights Act, the Arizona Fair Housing Act and the Arizonans with Disabilities Act. The Division conducts informal conciliation efforts and also files lawsuits seeking enforcement of these laws.

Complaints to the Arizona Attorney General can be filed online at <https://www.azag.gov/complaints/civil-rights> or by writing to or calling offices at:

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**Phoenix**

Arizona Attorney General's Office  
Civil Rights Division  
1275 W. Washington Street  
Phoenix, Arizona 85007  
602.542.5263  
602.542.5002 (TDD)  
877.491.5742 (toll free)

**Tucson**

Arizona Attorney General's Office  
Civil Rights Division  
400 W. Congress, Suite S-215  
Tucson, Arizona 85701  
520.628.6500  
520.628.6872 (TDD)  
877.491.5740 (toll free)

Complainants are contacted within 24 hours of receipt of the Civil Rights Intake Questionnaire to schedule an intake interview. Housing discrimination complaints can be filed on the basis of race, color, national origin, religion or creed, sex/gender, disability, familial status, and retaliation. If a person thinks they have been discriminated against with respect to housing, they must file their complaint with the Civil Rights Division within 12 months. The length of time available to file a complaint with the Attorney General's Office varies depending on the area of discrimination.

There is a sampling of lawsuits filed by the agency on its website. The bases for the discrimination claims included disability, religion, sex, familial status, and race. One of the fair housing cases on the website occurred in Glendale around 2006. A Glendale resident claimed that a property management company, Barrett-Eastman, LLC and its client, GCB Real Estate Investments, LLC refused to rent homes with pools to families with children. Upon investigation by the Attorney General's office, the company agreed to settle the case for \$27,500. The settlement agreement does not constitute an admission of liability by Barrett-Eastman. The company also agreed to provide current and prospective tenants, managers, and leasing agents with a written anti-discrimination policy specifying that it does not exclude or steer away qualified families with children from renting homes with pools. Additionally, Barrett-Eastman agreed to provide fair housing training to all its managers and leasing agents with emphasis on familial status discrimination and steering.

Southwest Fair Housing Council

The Southwest Fair Housing Council (SWFHC) was established in 1986. The SWFHC is a non-profit fair housing organization that assists in the enforcing the FHA in Arizona. The agency achieves this by conducting research, testing, community outreach, enforcement, and by providing referrals to the Arizona Attorney General, HUD, or other appropriate agencies.

The agency highlighted some of the fair housing actions it has taken in the City of Glendale which includes education and awareness training in collaboration with Neighborhood Alliance. The agency also conducted 29 tests in Glendale in 2013. Two (2) of the tests were conducted on the basis of national origin, one (1) on the basis of race, and 26 on the basis of disability. Of the 29 tests, 2 showed evidence of discrimination and five (5) were inconclusive.

Between 2010 and 2014, SWFHC contacted a total of 51 Glendale residents. Six of those contacted either filed a fair housing complaint or were referred to an entity to file a complaint. The bases for the potential complaints were: national origin and familial status (1 case); race (2 cases); disability (1 case); and national origin (1 case).

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The agency suggested actions that the City can take to further fair housing including utilizing CDBG funds and other funding sources to support a fair housing program that includes education, outreach, and enforcement activities. The enforcement component could include conducting tests on a regular basis to identify evidence of discrimination.

Community Legal Services

Community Legal Services (CLS) is a non-profit Arizona law firm that provides services to households whose household income is at or below 125% of the federal poverty level. The services that are available include volunteer lawyers which practice in the areas of family law, foreclosure law, labor and employment law, landlord/tenant, among other areas. The Community Outreach and Education Program (C.O.R.E.) takes the provided services to the five-county service area of the CLS.

The City of Glendale provides CDBG funding to CLS to promote fair housing awareness and distribute fair housing information at numerous locations in the City and on the City's website. CLS is contracted to provide legal services including court representation, legal advice and counsel, and conduct presentations and outreach related to the Fair Housing Act. CLS also reviews fair housing complaints received by the City and reports on actual discrimination cases. Table 47 provides details on complaint data collected by CLS by year.

From 2009 to 2013, there were 478 housing cases screened for fair housing and of this amount 32 cases were determined to be actual fair housing discrimination cases.

*Table 47. Fair Housing Complaints: 2009-2013 - Glendale, AZ*

Calendar Year	Glendale Housing Cases	Fair Housing Cases
2009	75	7
2010	104	9
2011	113	7
2012	89	1
2013	97	8

Glendale Hate Crimes

Any traditional crime, such as murder, arson, or vandalism, can be classified as a hate crime if it is motivated by a bias against a race, religion, disability, ethnic origin, or sexual orientation. Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments.

Hate crimes are reported to the Federal Bureau of Investigation (FBI) by jurisdictions. The AI reviewed the latest data for 2010 through 2012 for the City of Glendale. Incidents are reported by number of incidents per bias motivation based on the protected classes of race, religion, sexual orientation, ethnicity, and disability. There were a total of 30 hate crimes in Glendale between 2010 and 2012. The details on each crime is provided below in Table 48. Of the 30 hates crimes, race was the most dominant bias with 13 incidents (43%) followed by religion with 7 incidents (23%).



*Table 48. Hate Crime Incidents: 2010-2012 - Glendale, AZ*

Year	Number of Incidents per bias motivation					Total
	Race	Religion	Sexual Orientation	Ethnicity	Disability	
<b>2010</b>	7	3	1	2	0	<b>13</b>
<b>2011</b>	4	2	2	1	0	<b>9</b>
<b>2012</b>	2	2	2	2	0	<b>8</b>
<b>Total</b>	<b>13</b>	<b>7</b>	<b>5</b>	<b>5</b>	<b>0</b>	<b>30</b>

Source: Federal Bureau of Investigation

## Legal Cases

As part of the fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues in Glendale and in surrounding areas to understand fair housing developments and challenges and identify possible impediments or barriers to fair housing choice in the region.

### Arizona's Immigration Law

In 2010, the State of Arizona passed Senate Bill (SB) 1070 known as the Support Our Law Enforcement and Safe Neighborhoods Act. The parts of the Act that were upheld by the Supreme Court in 2012 prohibits the harboring of illegal immigrants and authorizes law enforcement to request immigration status documents from persons suspected of being in the county unlawfully.

According to the 2010 HUD Annual State of Fair Housing Report titled Live Free, various groups including Latino advocacy groups believed that the provisions of SB 1070 would have a negative impact on the traditional landlord/tenant relationship. The HUD Fair Housing and Equal Opportunity Office (FHEO) in collaboration with the Arizona Attorney General issued an advisory opinion to clarify the harboring provision of the Act.

The Advisory stated that SB 1070 does not apply or change fair housing laws, and that both the Federal Fair Housing Act and the Arizona Fair Housing Act continue to prohibit discrimination because of race, color, religion, sex, national origin, disability, and familial status in most housing- related transactions. In regards to tenant screening procedures, SB 1070 does not require or authorize landlords or property managers to inquire about a potential or existing tenant's immigration or citizenship status. SB 1070 also does not require landlords or property managers to report known or suspected undocumented persons to law enforcement authorities. The Advisory also clarified that the harboring provisions applies only to persons who are already in violation of another criminal offense, and it does not apply to housing providers and property managers who are not in violation of any criminal offense.

### George v. JGM Group LLC and Trojan Air Services

The case involves plaintiff, Ronnie George, who filed a housing discrimination case against JGM Group, LLC and Trojan Air Services, Inc., an Arizona Corporation DBA Village Sereno. The plaintiff claimed that his minor son, who uses a wheelchair for mobility, was discriminated against because of his disability when they visited the Village Sereno apartment complex in Glendale, AZ as prospective renters. The claim is based on failure in designing and constructing the apartments in accordance with

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FHA accessibility standards. The defendants denied the allegation and filed a third-party complaint against K-D Architects, the firm that provided construction and administration services for Village Sereno.

AIA et.al v U.S. Department of Housing and Urban Development

In June 2013, the American Insurance Association (AIA) and National Association of Mutual Insurance Companies (NAIMC) filed a suit against HUD alleging that HUD violated the Administrative Procedure Act (APA) by expanding the scope of the Fair Housing Act to include disparate impact claims. Specifically, HUD proposed “to prohibit housing practices with a discriminatory effect even when there has been no intent to discriminate” (Implementation of the Fair Housing Act’s Discriminatory Effects Standard, 76 Fed. Reg. 70,291).

The plaintiffs challenged the Rule because it identified the provision and pricing of homeowner’s insurance as a potential basis for disparate-impact liability. The court ruled that disparate impact claims are not cognizable under the FHA despite several prior federal court rulings that had the opposite conclusion. This decision will have an impact on the Texas Department of Housing and Community Affairs v. The Inclusive Communities Project, Inc. case where the Supreme Court of the United States will be making a decision on disparate impact claims under the FHA as well. A similar finding by the U.S. Supreme Court could affect HUD’s ability to enforce the FHA.

State of Arizona, Attorney General’s Office, Civil Rights Division

According to the Arizona AG’s Office, the AG Civil Rights Division has litigated two lawsuits involving Glendale properties since 2005. *State v. Ogorzaly, et al.* In this fair housing case, the AG Civil Rights Division filed a lawsuit against a landlord and Keller Williams Realty alleging that the Defendants had discriminated against prospective renters because they are black. The case was resolved via a Consent Decree with the defendants paying the charging parties \$55,000. Defendant Keller Williams also agreed to create policies prohibiting discrimination and to guide agents in handling clients who are engaged in discriminatory acts. In addition, the Consent Decree required Keller Williams to provide training on its new policies to its agents. The Consent Decree also resulted in a jointly sponsored Town Hall meeting at Glendale Community College that addressed the impact of housing discrimination, ways to change discriminatory attitudes, and specific steps that real estate professionals can take to help eradicate housing discrimination. (Source: *Arizona Attorney General 2008 Annual Report*)

*State v. AL-LH DB, LP, et al.* This fair housing lawsuit arose from allegations that the defendant had failed to provide a reasonable accommodation to disabled tenants in the form of parking spaces closer to their apartments. After the filing of the lawsuit, the parties entered into a Consent Decree under which defendants agreed to pay \$15,000 to the charging parties and their representatives and pay the Division \$5,000 in monitoring fees to ensure compliance with the Consent Decree. (Source: *Arizona Attorney General 2008 Annual Report*)

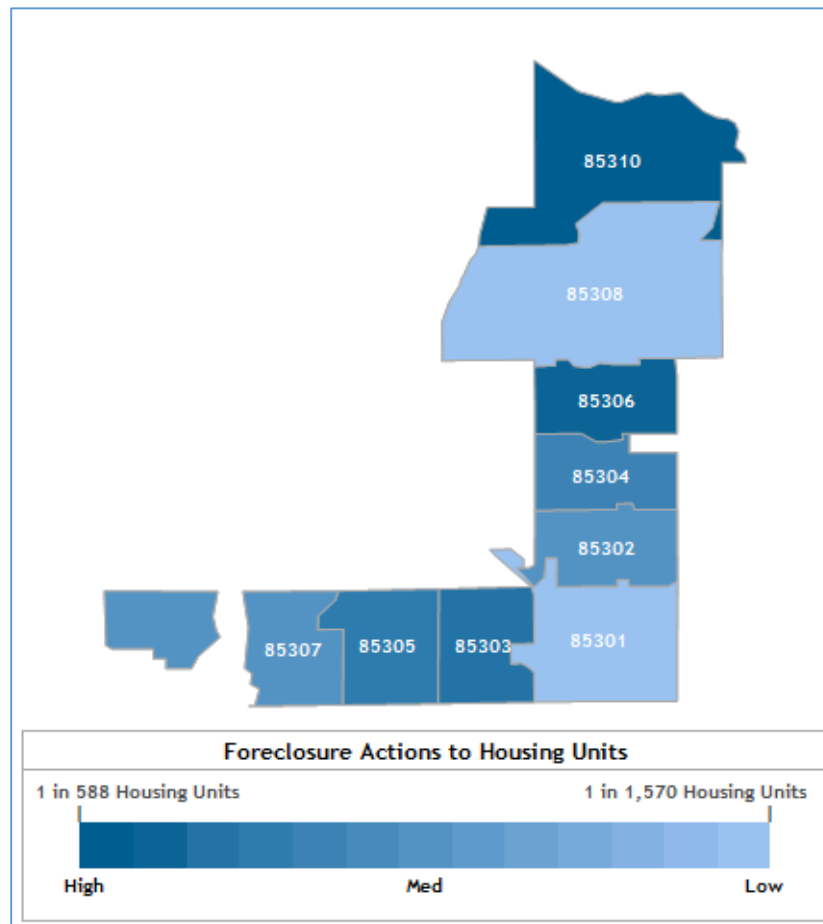
**Foreclosure Data**

For analysis of foreclosure impacts in Glendale, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-foreclosure, at auction, and bank-owned (REO) properties. The RealtyTrac data for Glendale was available for zip codes 85301, 85302, 85303, 85304, 85305, 85306, 85307, 85308, and 85310. The

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information from RealtyTrac represents current data for a snapshot in time (one calendar month), as of October 2014.

Figure 7. Foreclosure Action by Zip Code – Glendale, AZ

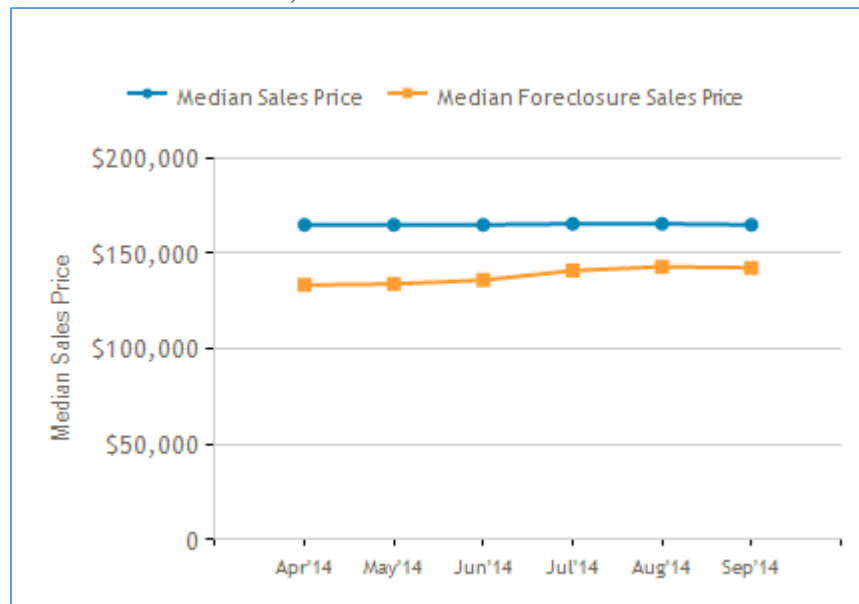


Source: RealtyTrac, 2014

According to RealtyTrac, in October 2014, the number of properties that received a foreclosure filing in Glendale was 5% lower than the previous month and 29% lower than the same time last year. Home sales for September 2014 were down 9% compared with the previous month, and up 1% compared with a year ago. The median sales price of a non-distressed home was \$165,000. The median sales price of a foreclosure home was \$142,500, or 14% lower than non-distressed home sales.

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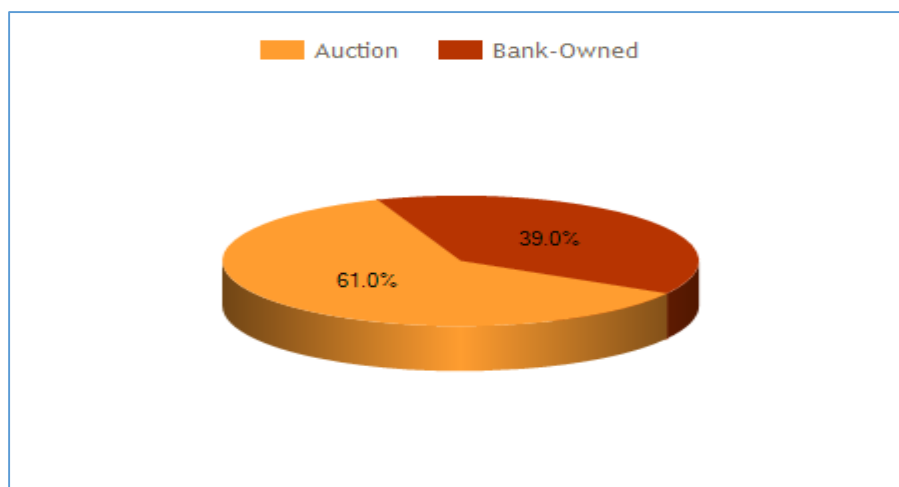
Figure 8. Median Sales Price - Glendale, AZ



Source: RealtyTrac, 2014

According to RealtyTrac, there are currently 1,443 properties in Glendale that are in some stage of foreclosure (default, auction, or bank owned) while the number of homes listed for sale on RealtyTrac is 1,039. RealtyTrac shows 61% of foreclosed properties in auction status and 39% as bank-owned.

Figure 9. Distribution of Foreclosure Types, Oct 2014 - Glendale, AZ

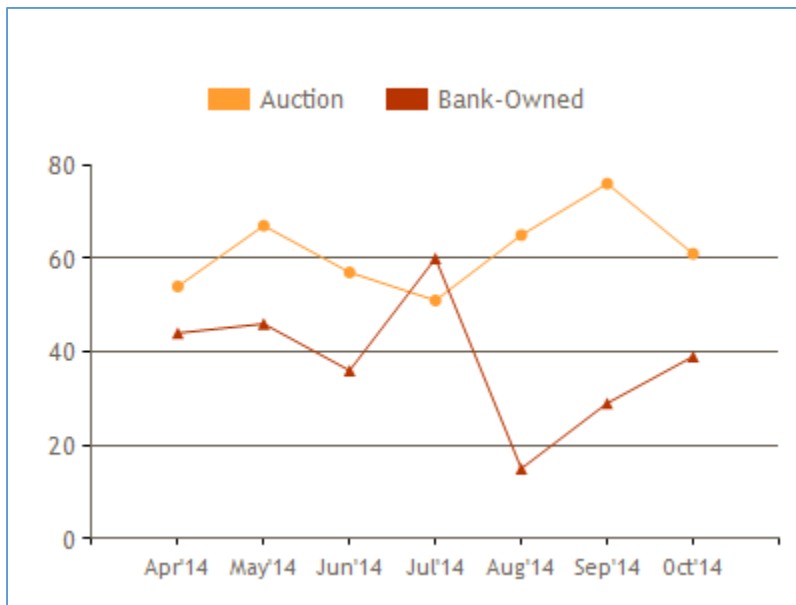


Source: RealtyTrac, 2014

The following figures illustrate the trend in foreclosure filings and sales in Glendale over the last year.

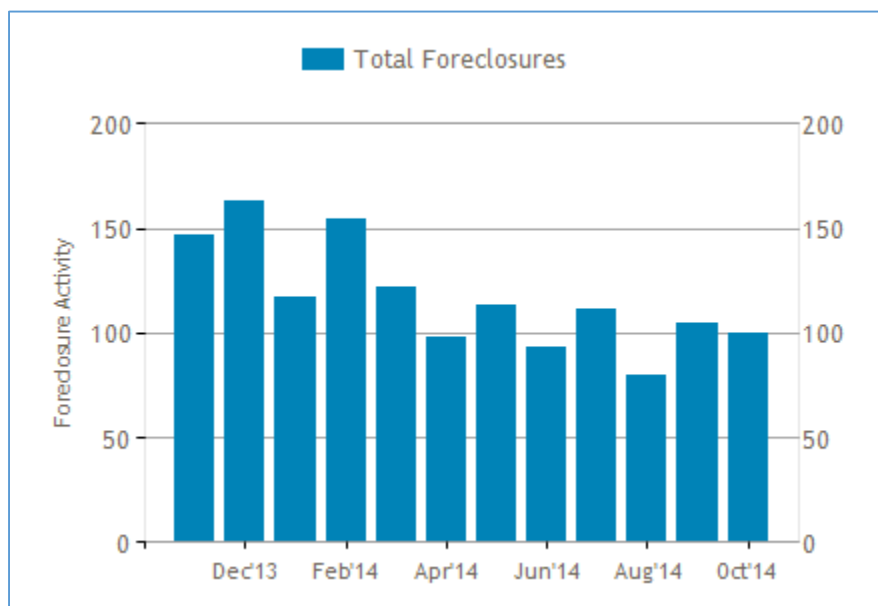
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Figure 10. Foreclosure Filings - Glendale, AZ



Source: RealtyTrac, 2014

Figure 11. Total Foreclosure Activity - Glendale, AZ



Source: RealtyTrac, 2014

The following table compares home sales and median sales price in nearby cities.

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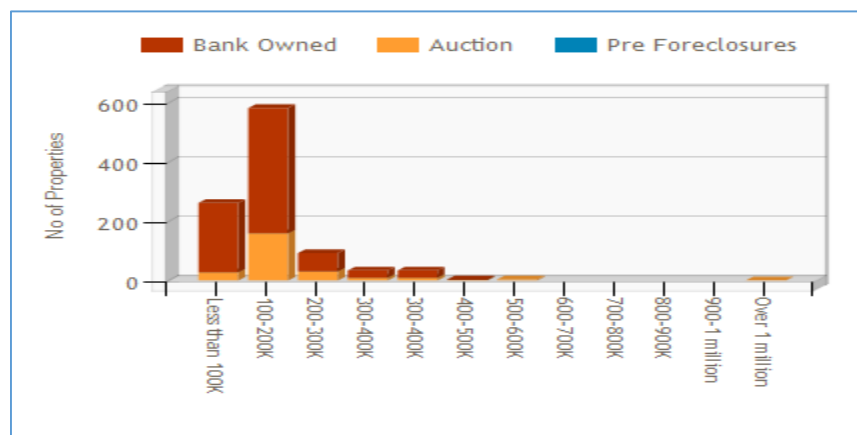
Table 49. Surrounding Area Home Sales and Median Sales Prices

Nearby City	Oct 2014 Total Sales (change from prior year)	Median Sales Price (change from prior year)
Phoenix	2,002 Down 19.0%	\$175,000 Up 8.0%
Scottsdale	625 Down 5.4%	\$340,000 Down 7.9%
Peoria	266 Down 23.1%	\$209,844 Down 0.1%
Surprise	265 Down 12.0%	\$182,500 Up 5.5%
Sun City	190 Down 5.0%	\$114,900 Up 2.6%
Avondale	181 Up 5.2%	\$176,500 Up 3.9%
Tolleson	119 Up 108.8%	\$152,900 Up 2.4%
Buckeye	115 Down 41.0%	\$149,900 Up 0.4%
Sun City West	90 Down 10.9%	\$167,500 Up 2.6%
Goodyear	88 Down 29.0%	\$199,000 Up 4.2%

Source: RealtyTrac, 2014

RealtyTrac reports that of the 1,443 Glendale properties in some stage of foreclosure, the highest availability rate occurs in the \$100,000 - \$200,000 price range (584 properties). The following is a depiction of properties available per estimated market for the City of Glendale in October 2014.

Figure 12. Number of Foreclosure Properties Available per Estimated Market - Glendale, AZ



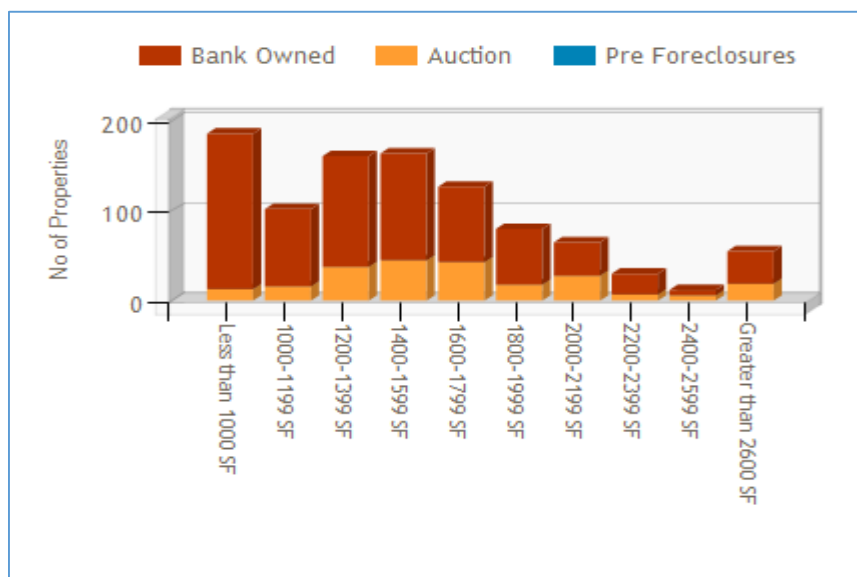
Source: RealtyTrac, 2014



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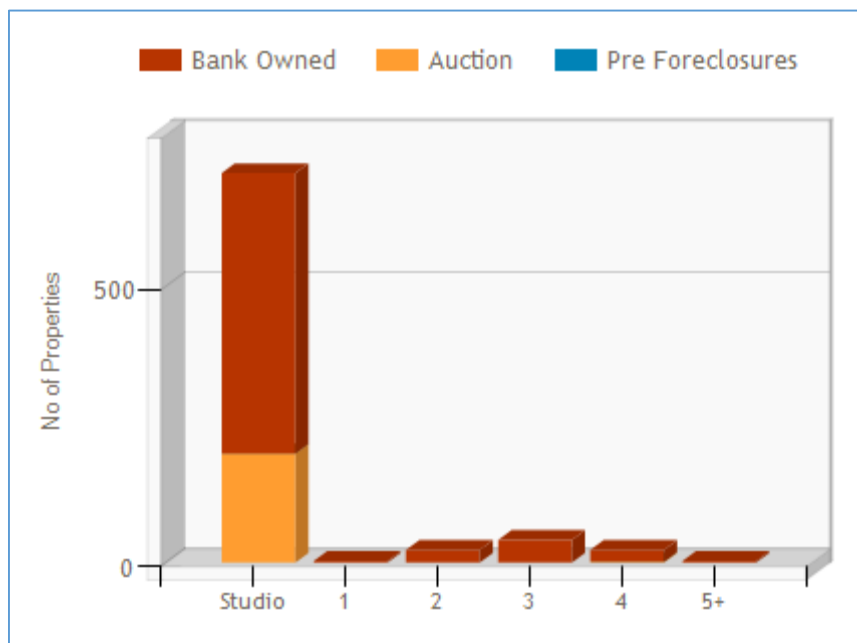
Of the foreclosure properties available in the Glendale market, RealtyTrac reports on the number of properties available per square footage, number of bedrooms, and year built. The following charts show that the highest availability of properties occurs with those that are less than 1,000 square feet (186 properties), studio properties (703 properties), and properties built between 1980 and 1989 (402 properties).

Figure 13. Number of Foreclosed Properties per Square Foot - Glendale, AZ



Source: RealtyTrac, 2014

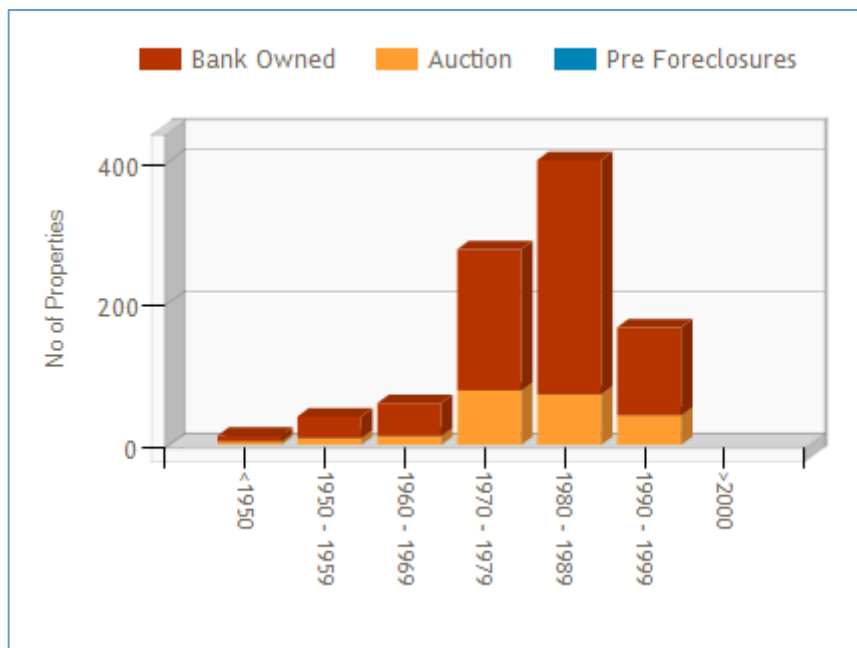
Figure 14. Number of Foreclosed Properties per Bedroom - Glendale, AZ



Source: RealtyTrac, 2014

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Figure 15. Number of Foreclosed Properties per Year Built - Glendale, AZ



Source: RealtyTrac, 2014

The following table is an analysis of foreclosure rates by zip codes in the City of Glendale. According to RealtyTrac, as of October 2014 there were 1,126 foreclosure cases within nine zip codes. The table below shows the number of units in foreclosure as well as the racial makeup and median household income for each zip code.

Table 50. Foreclosure Rate Analysis – Glendale, AZ

Zip Code	Racial Composition							Median HH Income	Foreclosure Activity (units)
	White	Black/ African American	Asian	American Indian	Multiracial	Other	Hispanic		
85301	21.2%	4.2%	0.0%	0.0%	0.0%	0.0%	74.6%	\$23,671	381
85302	68.8%	5.5%	8.2%	0.0%	3.9%	0.0%	13.6%	\$35,969	174
85303	34.6%	16.0%	0.0%	0.6%	0.0%	0.0%	48.6%	\$34,597	153
85304	77.6%	2.0%	4.5%	0.0%	0.0%	0.0%	15.9%	\$104,338	132
85305	0.0%	0.0%	18.2%	0.0%	9.1%	0.0%	72.7%	\$62,365	37
85306	72.2%	6.5%	0.0%	0.7%	0.0%	0.0%	19.9%	\$75,295	104
85307	47.1%	7.0%	1.4%	1.2%	2.6%	0.0%	40.7%	\$57,297	42
85308	81.9%	3.1%	3.4%	0.0%	4.0%	5.3%	2.3%	\$64,266	42
85310	87.4%	0.0%	2.4%	0.7%	0.0%	0.0%	9.5%	\$107,736	61

Source: Racial Composition and Median Household Income from City-Data for 2010 Census  
Foreclosure Rate from RealtyTrac as of October 2014

The purpose of this analysis is to determine if there is any correlation between foreclosure rates, minority concentration and low- and moderate-income areas. If a corresponding relationship exists between the variables this would be a clear impediment to fair housing choice.

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The zip codes with the largest percentage of minorities, 85301, 85303, 85305, and 85307, have a combined 613 units (54.4%) in foreclosure, and the zip codes with the least minorities, 85302, 85304, 85306, 85308, and 85310 have 513 units (45.6%) in foreclosure. In addition, the zip codes with lower median household incomes, that is, 85301, 85302, and 85303, account for 708 units (62.9%) in foreclosure.

Based on the data presented in Table 50, while there is a greater incidence of foreclosures in predominantly minority areas versus areas with less diversity, the foreclosure rate in the minority areas is not as significant as the foreclosure rate in the lower income areas. Income and factors related to income such as credit issues, underemployment, and unemployment play a greater role in the number of foreclosures in Glendale suggesting that the availability of affordable housing is an impediment to fair housing choice. In order to maintain homeownership opportunities in Glendale, the City should support the provision of services including housing counseling, credit counseling, and foreclosure prevention counseling specifically geared towards minorities since two of the three zip codes with the greatest foreclosure activity have a high minority concentration.

Over the last few years, the City of Glendale has taken proactive steps to address foreclosed and abandoned properties in targeted areas of the city. The City is a recipient of Neighborhood Stabilization Program (NSP) funds from HUD and as of November 2014, the City has expended close to \$11 million in NSP1 and NSP3 funding to address foreclosed, abandoned, and vacant properties to minimize the effect of these properties in the surrounding neighborhoods.

According to a report published by HUD and the U.S. Department of Treasury, *Spotlight on the Housing Market in: Phoenix-Mesa-Glendale, Arizona, 2011*, The Phoenix-Mesa-Glendale MSA, which includes Maricopa and Pinal Counties has been one of the hardest hit areas in the nation following the housing market downturn. The seven jurisdictions in the MSA (cities of Phoenix, Mesa, Glendale, Avondale, Chandler, Surprise, and Maricopa County) are faced with market conditions that reflect relatively new housing stock and a need for absorption of already existing homes. Therefore, NSP is mainly targeting homeownership assistance and rehabilitation of existing residential structures.

In Glendale, the NSP1 and NSP3 funds were expended in areas of greatest need as determined by the City. These areas include the three zip codes with the greatest foreclosure activity in Table 50. Specifically, the areas are neighborhoods within the Downtown Redevelopment Area (43rd - 67th Avenues; Orangewood to Maryland Avenues, others within the 85301 (census 931.02, 928 block group 1, 3, 4, 5, 6, and 931.01, 930, 929 block group 1, 924, 925, and 926), 85302 (census tracts 923.09, 923.07, and 923.04), and 85303 (census tracts 927.03, 927.13, 927.14, 927.12, and 927.05) zip codes.

The City has also created an internal "Foreclosure Task Force" to identify potential recommendations to assist individuals and neighborhoods in mitigating the impact of foreclosed and abandoned homes. This task force is made up of staff from the Code Compliance Department, the Community Services Group, and the Community Partnerships Department (which consists of the Community Revitalization Division, Neighborhood Partnership Office, and the Community Housing Division).

The City also supports several efforts to assist homeowners dealing with an imminent foreclosure and residents in neighborhoods with abandoned properties. In a Resource Guide published by the City,

residents are provided with information on how to report property maintenance issues, criminal or suspicious activity, and graffiti. Additional resources include housing counseling providers (Consumer Credit Housing Agency and Community Services of Arizona), the HOPE NOW Hotline which provides referrals to local Arizona foreclosure counselors, and Lawyers Helping Homeowners, a service provided by volunteer lawyers to help find lenders who will assist homeowners to avoid foreclosure.

## **HMDA Data Analysis**

### Introduction

This section contains an analysis of Home Mortgage Disclosure Act (HMDA) data for the City of Glendale, Arizona. The Home Mortgage Disclosure Act was enacted by Congress in 1975, and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public with loan application and approval data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities. The data assists public officials in distributing public-sector investments so as to attract private investment to areas where it is needed. The data can also be used to identify possible discriminatory lending patterns. Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and retrieval software on compact disk. Data can be retrieved or ordered at their website <http://www.ffiec.gov/hmda/hmdaproducts.htm>. The data contain variables that facilitate analysis of mortgage lending activity such as race, income, census tract, loan type, and loan purpose. Data can be summarized within the software package or downloaded in its raw form for analysis.

HMDA data consist of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions, and some mortgage companies. The data contain information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location, within areas of racial/ethnic and income distinction, for loans for one to four family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), refinancing, and home improvement loans.

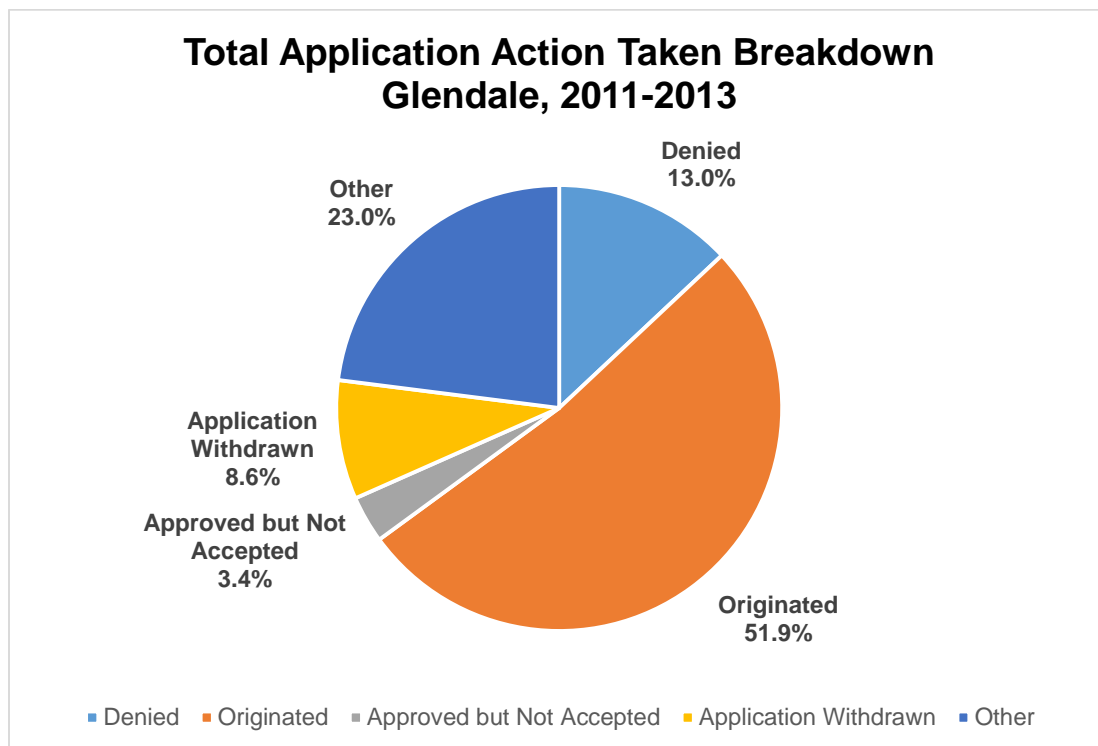
HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract that comprises the City of Glendale. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the citywide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race. For purposes of this analysis, a "minority" tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Glendale as a whole (27.3% based on FFIEC Census data for 2013). Therefore, tracts with a 32.3% or greater minority population would be considered a "minority" tract.

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In order to accurately portray HMDA data for the City, only those tracts that were either entirely within the City or whose area fell predominantly within City boundaries were utilized. Certain tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data is available for the three-year period, the most recent years, 2011-2013, were utilized in this analysis (extracted from HMDA Flat Files, 2011-2013).

Among the tracts analyzed, there were 36,711 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 13.0% of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied. The figure below gives an overview of the actions taken for all loans submitted to the City of Glendale from 2011-2013.

*Figure 16. HMDA, Total Applications Taken – Glendale, AZ*



### Overall Loan Application Comparison Data Analysis by Census Tract

The city of Glendale contains 61 total census tracts. Table 51 below shows a breakdown of the total denial rate of all 61 tracts as well as the minority denial rate by census tract.

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Table 51. Total Loan Applications and Denials: 2011-2013 – Glendale, AZ

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
610.44	2007	247	12.3%	286	46	16.1%	35.19
6176	778	75	9.6%	114	13	11.4%	21.8
610.45	1299	156	12.0%	142	21	14.8%	24.31
1042.24	943	142	15.1%	166	26	15.7%	20.46
6160	341	39	11.4%	42	4	9.5%	25.35
6178	509	48	9.4%	50	4	8.0%	14.16
6180	919	92	10.0%	94	17	18.1%	23.97
6158	976	111	11.4%	84	10	11.9%	16.65
6159	692	82	11.8%	69	10	14.5%	22.51
6140	986	83	8.4%	73	4	5.5%	17.39
1042.23	464	73	15.7%	45	6	13.3%	14.98
610.47	734	99	13.5%	146	26	17.8%	42.74
6157	707	76	10.7%	65	8	12.3%	16.85
927.21	861	89	10.3%	261	28	10.7%	52.41
6141	1252	121	9.7%	176	20	11.4%	22.47
6142	1041	125	12.0%	109	13	11.9%	17.19
6143	770	96	12.5%	91	13	14.3%	18.79
923.12	306	46	15.0%	76	13	17.1%	45.23
932	147	28	19.0%	42	11	26.2%	62.47
925	482	73	15.1%	154	26	16.9%	59.49
927.18	233	31	13.3%	116	13	11.2%	79.72
927.17	346	56	16.2%	164	30	18.3%	80.23
923.11	96	9	9.4%	26	2	7.7%	58.41
924.01	227	47	20.7%	63	17	27.0%	61.33
930.01	176	27	15.3%	57	14	24.6%	68.99
924.02	333	57	17.1%	90	17	18.9%	52.15
927.15	285	33	11.6%	133	8	6.0%	77.21
611	3	2	66.7%	2	2	100.0%	34.25
610.11	943	125	13.3%	260	51	19.6%	52.36
6179	398	43	10.8%	36	6	16.7%	17.17
6156	579	60	10.4%	14	2	14.3%	11.47
1042.27	359	57	15.9%	84	15	17.9%	22.49
923.09	944	125	13.2%	178	27	15.2%	21.67
1042.22	1102	150	13.6%	161	24	14.9%	22.99
1042.21	1140	141	12.4%	184	26	14.1%	24.08
927.1	1085	140	12.9%	340	54	15.9%	35.25
1042.17	786	109	13.9%	82	12	14.6%	19.74
610.46	623	84	13.5%	163	28	17.2%	54.04
1042.14	489	56	11.5%	58	7	12.1%	14.09
923.06	1268	162	12.8%	210	22	10.5%	35.94
923.07	999	129	12.9%	284	38	13.4%	46.54



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Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
923.08	1107	153	13.8%	223	39	17.5%	42.41
927.2	517	82	15.9%	159	27	17.0%	47.33
927.11	526	113	21.5%	169	32	18.9%	49.02
715.11	543	77	14.2%	107	7	6.5%	17
927.12	840	111	13.2%	324	48	14.8%	50.91
6177	161	20	12.4%	14	5	35.7%	35.32
927.05	666	86	12.9%	303	38	12.5%	63.05
931.06	217	38	17.5%	104	15	14.4%	76.92
927.16	300	60	20.0%	148	28	18.9%	76.54
923.05	652	80	12.3%	113	16	14.2%	23.46
1042.15	732	97	13.3%	69	11	15.9%	18.28
1042.16	850	116	13.6%	94	12	12.8%	23.69
931.04	103	11	10.7%	14	2	14.3%	55.42
929	74	21	28.4%	22	9	40.9%	84.01
931.05	96	18	18.8%	45	7	15.6%	78.33
928.01	106	29	27.4%	53	18	34.0%	85.91
930.02	144	24	16.7%	51	12	23.5%	73.37
931.01	218	42	19.3%	88	17	19.3%	50.97
928.02	130	28	21.5%	72	13	18.1%	83.84
926	101	25	24.8%	24	6	25.0%	57.12

Source: Data extracted for City of Glendale from HMDA, LAR Files

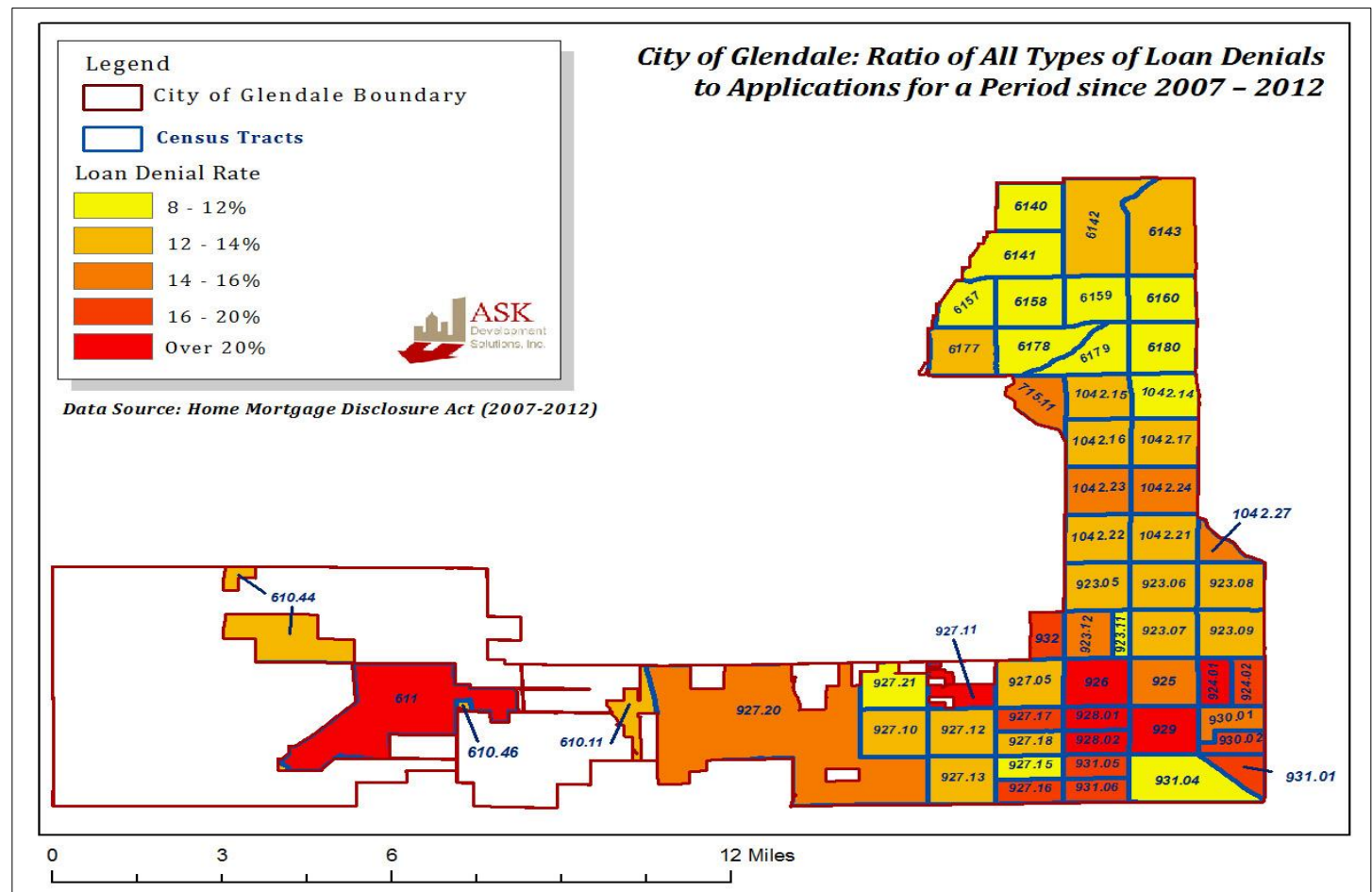
Census Tracts where the denial rate exceeds their tracts overall average of are highlighted in **YELLOW**.

In 2011-2013, 36,711 total applications were submitted with 19.5% (7,186) of them coming from minority applicants. Of these minority applications 15.3% (1,096) of those applications were denied. This is 2.3% higher than the 13.0% overall denial rate for all applications. In addition, of the 61 tracts, 70.4% (43) of them had a higher minority applicant denial rates than that of their respective tract.

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Map 15. Ratio of all Types of Loan Denials to Applications: 2007-2012 – Glendale, AZ



Source: Home Mortgage Disclosure Act (2007-2012)

## Loan Application Comparison Data Analysis by Minority Census Tract

The minority tracts were examined more closely and Table 52 below shows the loan application denial rates for all the minority census tracts in the city of Glendale.

*Table 52. Total Loan Applications and Denials, Minority Tracts: 2011-2013 – Glendale, AZ*

Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
928.02	130	28	21.5%	72	13	18.1%	35.19
931.05	96	18	18.8%	45	7	15.6%	50.91
931.06	217	38	17.5%	104	15	14.4%	50.97
6140	986	83	8.4%	73	4	5.5%	68.99

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Census Tract	Total Applications	Total Denials	Total Applicant Denial Rate	Total Minority Applications	Total Minority Denials	Total Minority Applicant Denial Rate	2013 Tract Minority %
1042.23	464	73	15.7%	45	6	13.3%	61.33
6160	341	39	11.4%	42	4	9.5%	78.33
6178	509	48	9.4%	50	4	8.0%	83.84
1042.16	850	116	13.6%	94	12	12.8%	55.42
931.01	218	42	19.3%	88	17	19.3%	45.23
6158	976	111	11.4%	84	10	11.9%	76.92
1042.24	943	142	15.1%	166	26	15.7%	62.47
1042.14	489	56	11.5%	58	7	12.1%	52.36
1042.17	786	109	13.9%	82	12	14.6%	57.12
1042.22	1102	150	13.6%	161	24	14.9%	59.49
6157	707	76	10.7%	65	8	12.3%	76.54
1042.21	1140	141	12.4%	184	26	14.1%	58.41
6176	778	75	9.6%	114	13	11.4%	79.72
1042.27	359	57	15.9%	84	15	17.9%	63.05
6159	692	82	11.8%	69	10	14.5%	77.21
1042.15	732	97	13.3%	69	11	15.9%	54.04
931.04	103	11	10.7%	14	2	14.3%	49.02
6156	579	60	10.4%	14	2	14.3%	73.37
6179	398	43	10.8%	36	6	16.7%	84.01
928.01	106	29	27.4%	53	18	34.0%	34.25
930.02	144	24	16.7%	51	12	23.5%	42.74
932	147	28	19.0%	42	11	26.2%	52.15
6180	919	92	10.0%	94	17	18.1%	85.91
930.01	176	27	15.3%	57	14	24.6%	35.32
929	74	21	28.4%	22	9	40.9%	35.25
6177	161	20	12.4%	14	5	35.7%	80.23
611	3	2	66.7%	2	2	100.0%	34.25
923.06	1268	162	12.8%	210	22	10.5%	35.94
923.07	999	129	12.9%	284	38	13.4%	46.54
923.08	1107	153	13.8%	223	39	17.5%	42.41
927.2	517	82	15.9%	159	27	17.0%	47.33
927.21	861	89	10.3%	261	28	10.7%	52.41

Of the 43 tracts with higher denial rates, 55.8% (24) of them are “minority” tracts. As mentioned previously, tracts with a 32.3% or greater minority population are considered a “minority” tract. Among the 61 identified Glendale tracts, 36 met the criteria and were designated as minority tracts in the analysis. Therefore, the data shows that 66.6%, or 24 out of the 36, total minority tracts had higher minority applicant denial rates than that of the overall denial rates. Not factoring in any other variables

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this would appear to indicate some discrimination in lending based on property location in areas of minority concentration. More analysis will need to be done in order to determine a definitive connection between these higher denial rates and areas with higher minority populations.

Analysis of Tracts by Income Characteristics

*High Income Tracts*

Table 53 below breaks down the median income category for all 61 Glendale tracts. The table notes that 28 census tracts within the City of Glendale exhibit median incomes that are higher than that of the MSA (those with a median income of >100%). Of these 28 higher income tracts only 21.4% (6) were minority tracts. Conversely, of the census tracts that met HUD's definition of low-income (less than 80% AMI), Glendale had a total of 19 tracts and all 19 tracts were minority tracts.

*Table 53. Total Median Categories for All Glendale Census Tracts, Minority Tracts: 2011-2013 - Glendale, AZ*

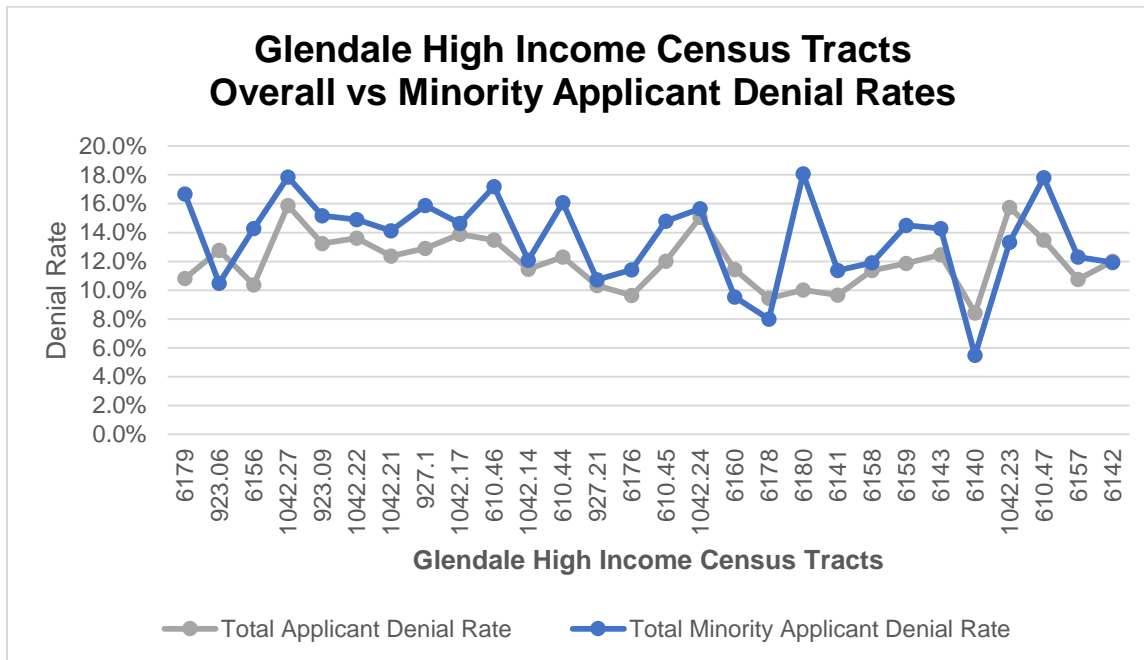
Census Tract	Median Income %	Income Category
931.04	34.63	Very Low
929	38.81	Very Low
931.05	44.46	Very Low
928.01	44.49	Very Low
930.02	44.81	Very Low
931.01	46.57	Very Low
928.02	47.72	Very Low
926	49.76	Very Low
923.12	52.36	Median (Low)
932	57.5	Median (Low)
925	58.82	Median (Low)
927.18	61.48	Median (Low)
611	63.03	Median (Low)
927.17	63.54	Median (Low)
923.11	65.55	Median (Low)
924.01	66.03	Median (Low)
930.01	67.22	Median (Low)
924.02	75.72	Median (Low)
927.15	78.74	Median (Low)
927.11	80.59	Median (Moderate)
715.11	83.02	Median (Moderate)
927.12	83.22	Median (Moderate)
6177	84.05	Median (Moderate)
927.05	86.4	Median (Moderate)
931.06	87.8	Median (Moderate)
927.16	89.61	Median (Moderate)
923.05	92.31	Median (Moderate)
1042.15	92.37	Median (Moderate)

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Census Tract	Median Income %	Income Category
1042.16	93.43	Median (Moderate)
923.08	94.48	Median (Middle)
927.2	95.54	Median (Middle)
923.07	96.82	Median (Middle)
610.11	97.61	Median (Middle)
6179	100.44	Median (Middle)
923.06	101.96	Median (Middle)
6156	102.59	Median (Middle)
1042.27	106.96	Median (Middle)
923.09	107.65	Median (Middle)
1042.22	107.71	Median (Middle)
1042.21	110.51	Median (Middle)
927.1	110.88	Median (Middle)
1042.17	111.09	Median (Middle)
610.46	113.51	Median (Middle)
1042.14	119.53	Median (Middle)
610.44	122.21	Median (High)
927.21	124.98	Median (High)
6176	125.47	Median (High)
610.45	129.21	Median (High)
1042.24	134.66	Median (High)
6160	135.28	Median (High)
6178	141.95	Median (High)
6180	144.26	Median (High)
6141	146.36	Median (High)
6158	146.99	Median (High)
6159	156.38	Median (High)
6143	156.82	Median (High)
6140	160.23	Median (High)
1042.23	160.89	Median (High)
610.47	161.33	Median (High)
6157	162.38	Median (High)
6142	175.57	Median (High)

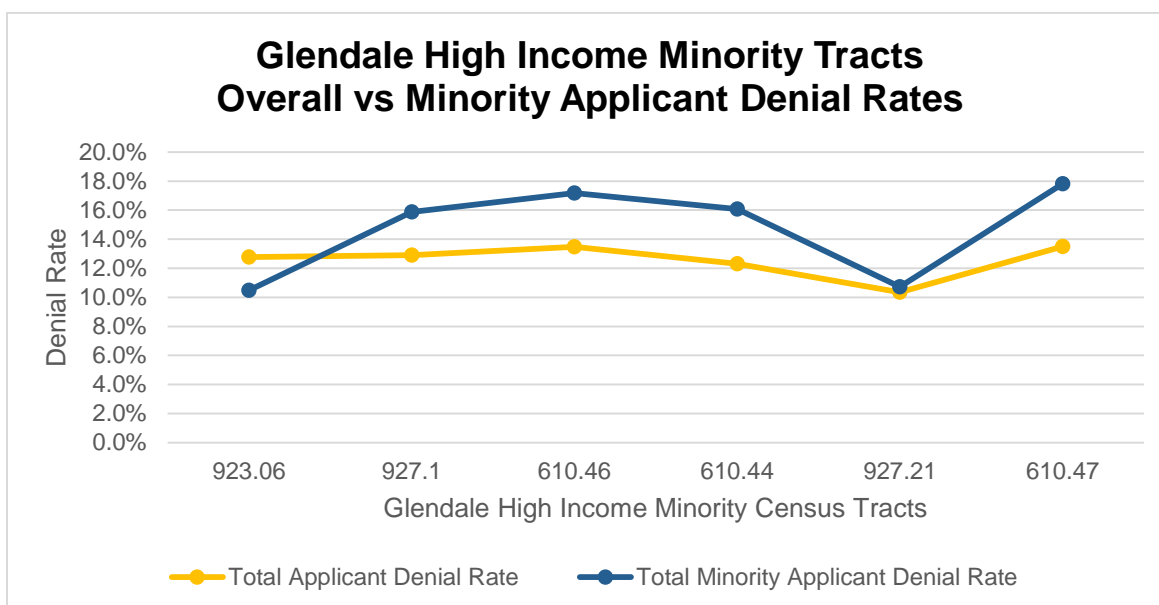
In addition, to breaking down the median income category data. The HMDA data also looked at any connection between denial rates and median income. The data noted a trend (pictured below). For example, of the 28 census tracts with income levels higher than the MSA (those with a median income of >100%), 78.5% (22) of the tracts have a higher minority applicant denial rate than that of the overall denial rate.

Figure 17. High Income Census Tracts Overall vs Minority Applicant Denial Rates - Glendale, AZ



The data also notes that this higher minority denial trend is still reflected when you look exclusively at high income level minority tracts only. For example, of the 6 “minority” census tracts with income levels higher than the MSA, 5 out of the 6 tracts have a higher minority applicant denial rate than that of the overall denial rate. This would seem to indicate that higher income applicants may still face hurdles in qualifying for loans, and that these hurdles have the capacity to disproportionately affect even high income minority households.

Figure 18. High Income Minority Tracts Overall vs Minority Applicant Denial Rates - Glendale, AZ



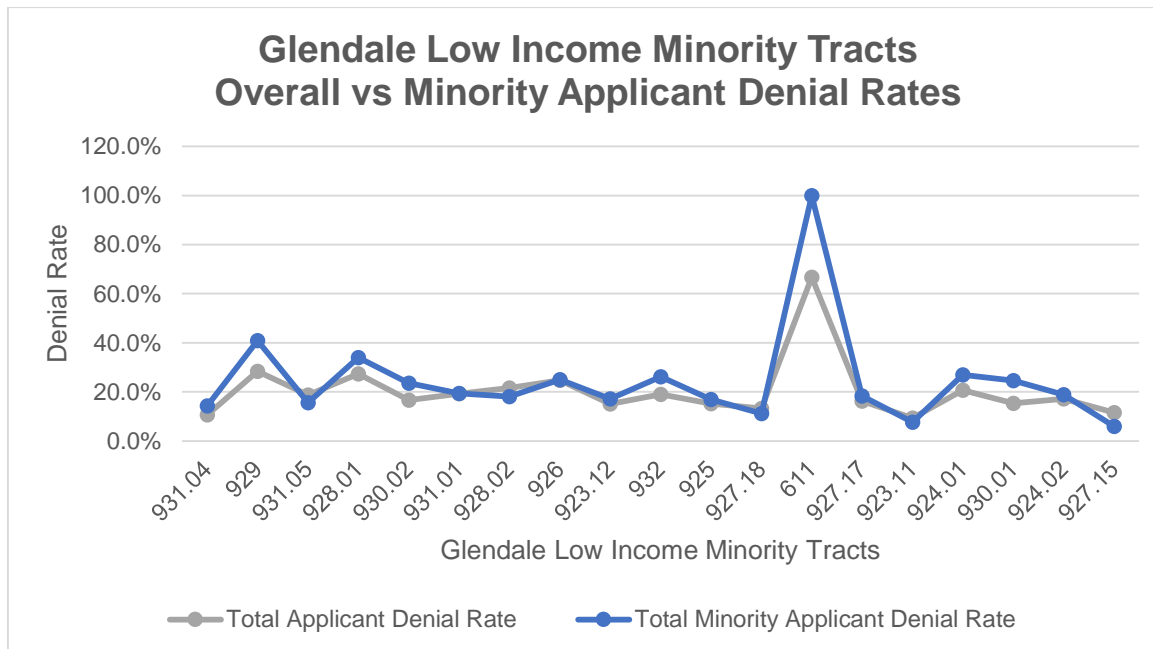


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### *Low Income Tracts*

When examining lower income households, the same higher denial trend found in the high income tracts emerges. For example, of the 19 tracts with median incomes that fell below 80% of their MSA, 68.4% (13) of the tracts had a higher minority applicant denial rate than that of the overall denial rate for their tract. As mentioned previously, all 19 low income tracts in Glendale fell into the minority tract category.

*Figure 19. Low Income Minority Tracts Overall vs Minority Applicant Denial Rates - Glendale, AZ*

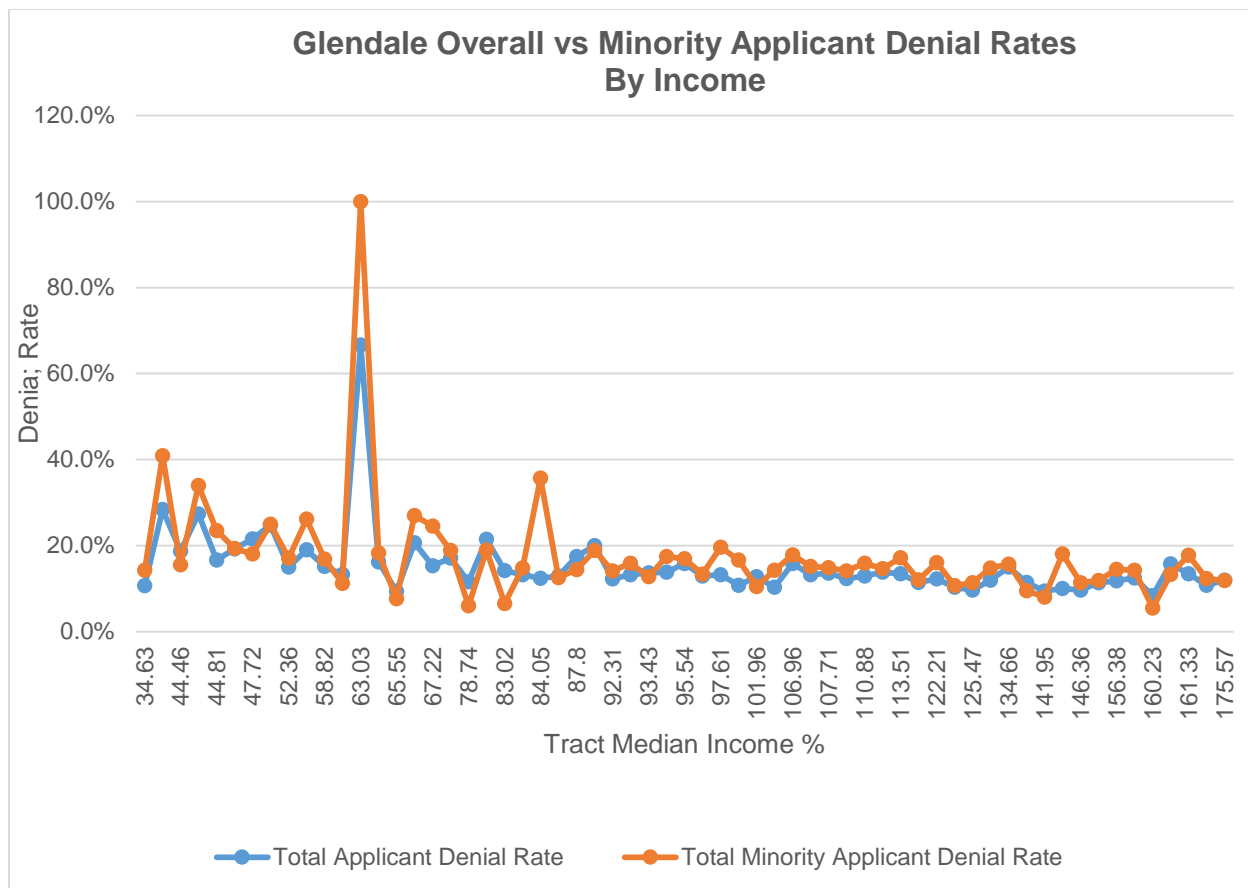


### *All Tracts by Income*

Finally, Figure 20 below shows a comparison of all 61 Glendale tracts, and the trend of higher denial rate can be seen across the board when using median income as the main comparison. The data shows that, as an overall standard, it appears minority application denial rates are higher with the biggest differences in denial rate occurring in tracts with lower median incomes.

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Figure 20. Overall vs Minority Applicant Denial Rates by Income – Glendale, AZ



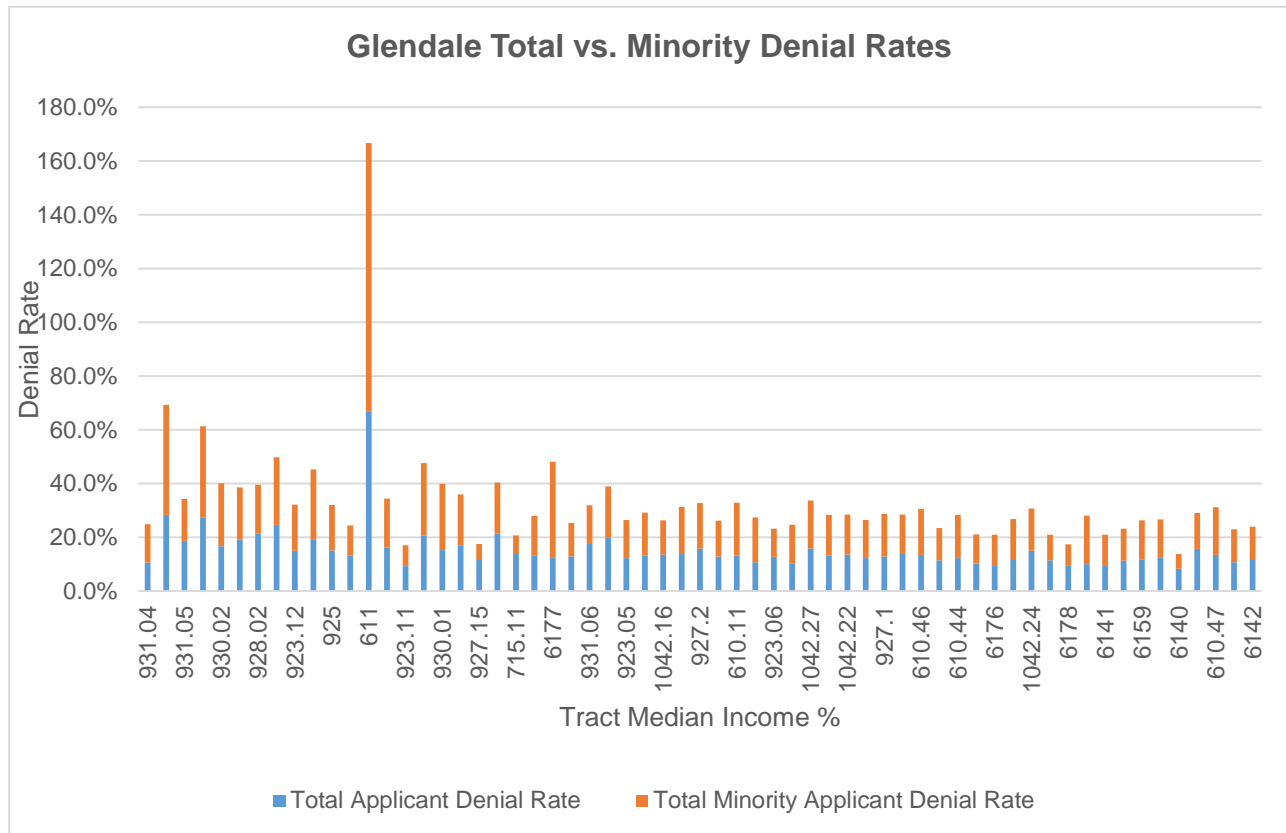
These income characteristics do not necessarily suggest discriminatory practices based on low income level but could mean that lower-income households may be facing other challenges such as creditworthiness, low paying jobs, and higher debt and are unable to qualify for a loan. The concern about these challenges increases when the fact that Glendale’s low- income tracts have a high minority population.

### Denial Rates and Minority Loan Applications

As mentioned before, the majority of tracts with higher minority application denial rates than overall rates were minority tracts. Furthermore, the majority of the minority tracts also make up those tracts with the highest minority application denial rate/overall rate disparities. Table 55 shows the difference in denial rates in all 61 Glendale tracts. For example, tract 611 has an overall application denial rate of 66.7%, while the minority application rate is 100%. While this 33.3% jump is the highest for all the tracts in Glendale, it is import to note that this tract had a small number of total applications (3). The second to largest disparity however, still shows this pattern. Tract 6177, also a minority tract, has a minority application rate of 35.7% while the overall denial rate is the 12.4 %.

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Figure 21. Total vs Minority Denial Rates - Glendale, AZ



Typically, there is a correlation between high denial rates and low median income, and Glendale conforms to this pattern. Of the 15 tracts with highest overall denial rates (a denial rate of over 16%), 7 (46.6%) of them had a median income of Very Low. The remaining 8 tracts consisted of 5 Median (Low) tracts and 3 Median Moderate tract.

Table 54. Census Tracts with Highest Overall Denial Rates – Glendale, AZ

Glendale Census Tracts with Highest Overall Denial Rates					
Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Median Income %	Income Category
611	66.7%	100.0%	34.25	63.03	Median (Low)
929	28.4%	40.9%	84.01	38.81	Very Low
928.01	27.4%	34.0%	85.91	44.49	Very Low
926	24.8%	25.0%	57.12	49.76	Very Low
928.02	21.5%	18.1%	83.84	47.72	Very Low
927.11	21.5%	18.9%	49.02	80.59	Median (Moderate)
924.01	20.7%	27.0%	61.33	66.03	Median (Low)
927.16	20.0%	18.9%	76.54	89.61	Median (Moderate)

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Glendale Census Tracts with Highest Overall Denial Rates					
Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Median Income %	Income Category
931.01	19.3%	19.3%	50.97	46.57	Very Low
932	19.0%	26.2%	62.47	57.5	Median (Low)
931.05	18.8%	15.6%	78.33	44.46	Very Low
931.06	17.5%	14.4%	76.92	87.8	Median (Moderate)
924.02	17.1%	18.9%	52.15	75.72	Median (Low)
930.02	16.7%	23.5%	73.37	44.81	Very Low
927.17	16.2%	18.3%	80.23	63.54	Median (Low)

This is also true when you look exclusively at the minority application rates. Of the 26 tracts with the highest minority application denial rates (a denial rate of over 16%), 30.4% (7) were tracts with a median income of Low, 26.0% (6) were Very Low -income tracts, 13.0% (3) were Moderate -income tracts, and 17.3% (4) were Middle income tracts.

Table 55. Census Tracts with Highest Overall Denial Rates

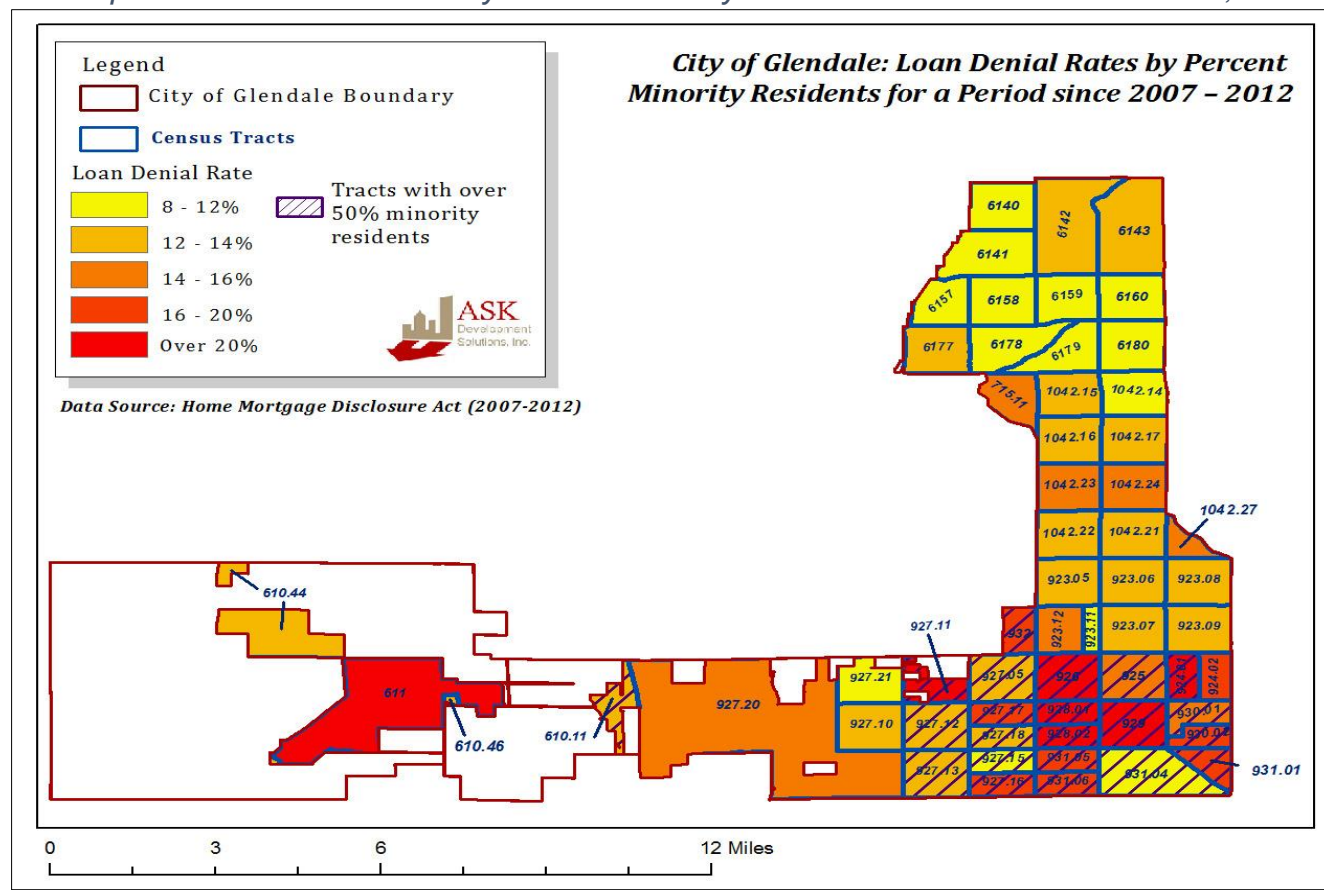
Glendale Census Tracts with Highest Overall Denial Rates					
Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Median Income %	Income Category
611	66.7%	100.0%	34.25	63.03	Median (Low)
929	28.4%	40.9%	84.01	38.81	Very Low
6177	12.4%	35.7%	35.32	84.05	Median (Moderate)
928.01	27.4%	34.0%	85.91	44.49	Very Low
924.01	20.7%	27.0%	61.33	66.03	Median (Low)
932	19.0%	26.2%	62.47	57.5	Median (Low)
926	24.8%	25.0%	57.12	49.76	Very Low
930.01	15.3%	24.6%	68.99	67.22	Median (Low)
930.02	16.7%	23.5%	73.37	44.81	Very Low
610.11	13.3%	19.6%	52.36	97.61	Median (Middle)
931.01	19.3%	19.3%	50.97	46.57	Very Low
927.11	21.5%	18.9%	49.02	80.59	Median (Moderate)
927.16	20.0%	18.9%	76.54	89.61	Median (Moderate)
924.02	17.1%	18.9%	52.15	75.72	Median (Low)
927.17	16.2%	18.3%	80.23	63.54	Median (Low)
6180	10.0%	18.1%	23.97	144.26	Median (High)
928.02	21.5%	18.1%	83.84	47.72	Very Low
1042.27	15.9%	17.9%	22.49	106.96	Median (Middle)
610.47	13.5%	17.8%	42.74	161.33	Median (High)
923.08	13.8%	17.5%	42.41	94.48	Median (Middle)
610.46	13.5%	17.2%	54.04	113.51	Median (Middle)

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Glendale Census Tracts with Highest Overall Denial Rates					
Census Tract	Total Applicant Denial Rate	Total Minority Applicant Denial Rate	2013 Tract Minority %	Median Income %	Income Category
923.12	15.0%	17.1%	45.23	52.36	Median (Low)
927.2	15.9%	17.0%	47.33	95.54	Median (Middle)
925	15.1%	16.9%	59.49	58.82	Median (Low)
6179	10.8%	16.7%	17.17	100.44	Median (Middle)
610.44	12.3%	16.1%	35.19	122.21	Median (High)

Overall, the data indicates that the elevated denial rate among tracts appears to be based on the income and racial/ethnic characteristics of the tract. The HMDA data also suggests that there may be discriminatory lending based on race/ethnicity of property location within the City of Glendale as well as income characteristics. A definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level, specific to the City of Glendale. Map 16 gives a visual presentation of the data analyzed in this section.

Map 16. Loan Denial Rated by Percent Minority Residents: 2007-2012 – Glendale, AZ



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Loan Application Denials Breakdowns by Loan Type

Tables 56-58 examine total conventional loan denials by loan purpose. There are three classifications for loan type: conventional, FHA, and VA loans. Conventional loans are loans that are not guaranteed or insured by the federal government under the Veterans Administration (VA), the Federal Housing Administration (FHA), or the Rural Housing Service (RHS) of the U.S. Department of Agriculture. FHA and VA loans are backed by the government, meaning that the FHA or the Department of Veteran's Affairs promises to pay lenders if a borrower defaults on the loan. Borrowers must meet certain requirements to be eligible for each loan type.

*Table 56. Home Purchase Loan Applications: 2011-2013 – Glendale, AZ*

<b>Home Purchase Loans Applications Glendale, Arizona 2011-2013</b>				
<b>Census Tracts</b>	<b>Home Purchase Loans (Conventional) Applications</b>	<b>Home Purchase Loan Denials (Conventional) Application Denials</b>	<b>Home Purchase Loan (Conventional) Application Denial Rates %</b>	<b>2013 Tract Minority %</b>
<b>610.11</b>	139	15	10.8%	52.36
<b>610.44</b>	327	25	7.6%	35.19
<b>610.45</b>	251	22	8.8%	24.31
<b>610.46</b>	92	8	8.7%	54.04
<b>610.47</b>	107	12	11.2%	42.74
<b>611</b>	1	1	100.0%	34.25
<b>715.11</b>	107	4	3.7%	17
<b>923.05</b>	92	15	16.3%	23.46
<b>923.09</b>	138	10	7.2%	21.67
<b>923.11</b>	18	1	5.6%	58.41
<b>923.12</b>	49	11	22.4%	45.23
<b>924.01</b>	34	11	32.4%	61.33
<b>924.02</b>	52	8	15.4%	52.15
<b>925</b>	92	9	9.8%	59.49
<b>926</b>	26	1	3.8%	57.12
<b>927.05</b>	138	7	5.1%	63.05
<b>927.1</b>	140	12	8.6%	35.25
<b>927.11</b>	150	53	35.3%	49.02
<b>927.12</b>	162	16	9.9%	50.91
<b>927.15</b>	34	5	14.7%	77.21
<b>927.16</b>	20	1	5.0%	76.54
<b>927.17</b>	39	5	12.8%	80.23
<b>927.18</b>	33	2	6.1%	79.72
<b>928.01</b>	24	6	25.0%	85.91
<b>928.02</b>	20	5	25.0%	83.84
<b>929</b>	36	7	19.4%	84.01



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<i>Home Purchase Loans Applications Glendale, Arizona 2011-2013</i>				
<b>930.01</b>	30	2	6.7%	68.99
<b>930.02</b>	18	4	22.2%	73.37
<b>931.01</b>	21	6	28.6%	50.97
<b>931.04</b>	28	1	3.6%	55.42
<b>931.05</b>	15	5	33.3%	78.33
<b>931.06</b>	39	8	20.5%	76.92
<b>932</b>	31	8	25.8%	62.47
<b>1042.14</b>	70	5	7.1%	14.09
<b>1042.15</b>	88	12	13.6%	18.28
<b>1042.16</b>	101	8	7.9%	23.69
<b>1042.17</b>	109	17	15.6%	19.74
<b>1042.21</b>	155	13	8.4%	24.08
<b>1042.22</b>	142	17	12.0%	22.99
<b>1042.23</b>	87	7	8.0%	14.98
<b>1042.24</b>	166	21	12.7%	20.46
<b>1042.27</b>	45	2	4.4%	22.49
<b>6140</b>	151	2	1.3%	17.39
<b>6156</b>	152	2	1.3%	11.47
<b>6157</b>	131	3	2.3%	16.85
<b>6158</b>	198	16	8.1%	16.65
<b>6159</b>	100	11	11.0%	22.51
<b>6160</b>	52	1	1.9%	25.35
<b>6176</b>	117	4	3.4%	21.8
<b>6177</b>	21		0.0%	35.32
<b>6178</b>	76	5	6.6%	14.16
<b>6179</b>	39	1	2.6%	17.17
<b>6180</b>	114	6	5.3%	23.97
<b>923.06</b>	191	18	9.4%	35.94
<b>923.07</b>	161	14	8.7%	46.54
<b>923.08</b>	147	19	12.9%	42.41
<b>927.2</b>	63	16	25.4%	47.33
<b>927.21</b>	166	14	8.4%	52.41
<b>6141</b>	285	20	7.0%	22.47
<b>6142</b>	191	19	9.9%	17.19
<b>6143</b>	172	14	8.1%	18.79

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Table 57. Refinance Loan Applications: 2011-2013 - Glendale, AZ

<b>Refinance Loan Applications Glendale, Arizona 2011-2013</b>				
<b>Census Tracts</b>	<b>Total Refinance Loan Applications</b>	<b>Refinance Loan Application Denials</b>	<b>Refinance Loan Application Denial Rates %</b>	<b>2013 Tract Minority %</b>
610.11	571	81	14.2%	52.36
610.44	931	129	13.9%	35.19
610.45	653	95	14.5%	24.31
610.46	392	54	13.8%	54.04
610.47	488	75	15.4%	42.74
611	1	0	0.0%	34.25
715.11	273	45	16.5%	17
923.05	374	43	11.5%	23.46
923.09	551	82	14.9%	21.67
923.11	61	3	4.9%	58.41
923.12	185	26	14.1%	45.23
924.01	130	24	18.5%	61.33
924.02	194	34	17.5%	52.15
925	266	48	18.0%	59.49
926	44	15	34.1%	57.12
927.05	213	44	20.7%	63.05
927.1	546	89	16.3%	35.25
927.11	250	38	15.2%	49.02
927.12	384	59	15.4%	50.91
927.15	141	25	17.7%	77.21
927.16	167	45	26.9%	76.54
927.17	197	38	19.3%	80.23
927.18	121	19	15.7%	79.72
928.01	56	14	25.0%	85.91
928.02	67	17	25.4%	83.84
929	20	6	30.0%	84.01
930.01	98	15	15.3%	68.99
930.02	87	15	17.2%	73.37
931.01	136	25	18.4%	50.97
931.04	37	6	16.2%	55.42
931.05	44	9	20.5%	78.33
931.06	100	21	21.0%	76.92
932	89	13	14.6%	62.47
1042.14	295	45	15.3%	14.09
1042.15	426	60	14.1%	18.28
1042.16	519	71	13.7%	23.69
1042.17	459	62	13.5%	19.74
1042.21	651	96	14.7%	24.08

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<b>Refinance Loan Applications Glendale, Arizona 2011-2013</b>				
<b>1042.22</b>	668	98	14.7%	22.99
<b>1042.23</b>	315	56	17.8%	14.98
<b>1042.24</b>	568	95	16.7%	20.46
<b>1042.27</b>	197	41	20.8%	22.49
<b>6140</b>	677	64	9.5%	17.39
<b>6156</b>	366	53	14.5%	11.47
<b>6157</b>	472	59	12.5%	16.85
<b>6158</b>	634	77	12.1%	16.65
<b>6159</b>	507	67	13.2%	22.51
<b>6160</b>	240	34	14.2%	25.35
<b>6176</b>	537	60	11.2%	21.8
<b>6177</b>	111	18	16.2%	35.32
<b>6178</b>	384	39	10.2%	14.16
<b>6179</b>	315	33	10.5%	17.17
<b>6180</b>	592	64	10.8%	23.97
<b>923.06</b>	734	113	15.4%	35.94
<b>923.07</b>	547	83	15.2%	46.54
<b>923.08</b>	598	93	15.6%	42.41
<b>927.2</b>	328	45	13.7%	47.33
<b>927.21</b>	375	44	11.7%	52.41
<b>6141</b>	806	89	11.0%	22.47
<b>6142</b>	722	95	13.2%	17.19
<b>6143</b>	535	74	13.8%	18.79

Table 58. Home Improvement Loan Applications: 2011-2013 - Glendale, AZ

<b>Home Improvement Loan Applications Glendale, Arizona 2011-2013</b>				
<b>Census Tracts</b>	<b>Home Improvement Loan Applications</b>	<b>Home Improvement Loan Application Denials</b>	<b>Home Improvement Loan Application Denial Rates %</b>	<b>2013 Tract Minority %</b>
<b>610.11</b>	15	9	60.0%	52.36
<b>610.44</b>	56	28	50.0%	35.19
<b>610.45</b>	32	11	34.4%	24.31
<b>610.46</b>	16	10	62.5%	54.04
<b>610.47</b>	12	1	8.3%	42.74
<b>611</b>	0	0	0.0%	34.25
<b>715.11</b>	20	12	60.0%	17
<b>923.05</b>	19	11	57.9%	23.46
<b>923.09</b>	21	10	47.6%	21.67
<b>923.11</b>	3	2	66.7%	58.41

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<b>Home Improvement Loan Applications Glendale, Arizona 2011-2013</b>				
<b>923.12</b>	5	4	80.0%	45.23
<b>924.01</b>	6	3	50.0%	61.33
<b>924.02</b>	10	5	50.0%	52.15
<b>925</b>	15	8	53.3%	59.49
<b>926</b>	3	3	100.0%	57.12
<b>927.05</b>	15	12	80.0%	63.05
<b>927.1</b>	26	12	46.2%	35.25
<b>927.11</b>	17	14	82.4%	49.02
<b>927.12</b>	16	7	43.8%	50.91
<b>927.15</b>	9	1	11.1%	77.21
<b>927.16</b>	5	3	60.0%	76.54
<b>927.17</b>	11	6	54.5%	80.23
<b>927.18</b>	5	5	100.0%	79.72
<b>928.01</b>	6	5	83.3%	85.91
<b>928.02</b>	4	2	50.0%	83.84
<b>929</b>	3	2	66.7%	84.01
<b>930.01</b>	5	3	60.0%	68.99
<b>930.02</b>	3	2	66.7%	73.37
<b>931.01</b>	6	5	83.3%	50.97
<b>931.04</b>	5	4	80.0%	55.42
<b>931.05</b>	5	3	60.0%	78.33
<b>931.06</b>	4	2	50.0%	76.92
<b>932</b>	5	4	80.0%	62.47
<b>1042.14</b>	4	1	25.0%	14.09
<b>1042.15</b>	19	10	52.6%	18.28
<b>1042.16</b>	27	16	59.3%	23.69
<b>1042.17</b>	21	13	61.9%	19.74
<b>1042.21</b>	26	13	50.0%	24.08
<b>1042.22</b>	20	12	60.0%	22.99
<b>1042.23</b>	8	5	62.5%	14.98
<b>1042.24</b>	16	9	56.3%	20.46
<b>1042.27</b>	9	5	55.6%	22.49
<b>6140</b>	14	4	28.6%	17.39
<b>6156</b>	13	1	7.7%	11.47
<b>6157</b>	18	6	33.3%	16.85
<b>6158</b>	21	9	42.9%	16.65
<b>6159</b>	15	0	0.0%	22.51
<b>6160</b>	8	2	25.0%	25.35
<b>6176</b>	17	3	17.6%	21.8
<b>6177</b>	7	1	14.3%	35.32
<b>6178</b>	11	2	18.2%	14.16
<b>6179</b>	8	6	75.0%	17.17
<b>6180</b>	18	10	55.6%	23.97
<b>923.06</b>	35	15	42.9%	35.94
<b>923.07</b>	19	9	47.4%	46.54

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<b>Home Improvement Loan Applications Glendale, Arizona 2011-2013</b>				
<b>923.08</b>	<b>28</b>	<b>18</b>	<b>64.3%</b>	<b>42.41</b>
<b>927.2</b>	<b>17</b>	<b>5</b>	<b>29.4%</b>	<b>47.33</b>
<b>927.21</b>	<b>16</b>	<b>9</b>	<b>56.3%</b>	<b>52.41</b>
<b>6141</b>	<b>16</b>	<b>3</b>	<b>18.8%</b>	<b>22.47</b>
<b>6142</b>	<b>15</b>	<b>4</b>	<b>26.7%</b>	<b>17.19</b>
<b>6143</b>	<b>11</b>	<b>5</b>	<b>45.5%</b>	<b>18.79</b>

Loan Originations and Comparison Analysis

This section examines originations (the number of applications that result in loans being made) and denial rates broken down by race/ethnicity. The first table breaks these characteristics down by the three conventional loan types. Of the 36,711 loan applications submitted between 2011 and 2013, 27,454, or 74.7%, were conventional loans. The majority of conventional loan applications in the City of Glendale were for refinancing (76.9%), followed by home purchase loans (20.0%), and home improvement loans (2.9%). The loan denial rate for refinancing loans was 14.3% and the denial rate for home purchase loans was 10.5%. Home improvement loans had a denial rate of 47.9%, but this is skewed by the small number of home improvement loan applications.

*Table 59. Analysis of HMDA Activity: 2011-2013 - Glendale, AZ*

<b>Home Mortgage Disclosure Act (HMDA) Analysis</b>						
<b>Comparison of Originations Within Categories</b>						
<b>HMDA Activity for Glendale, AZ</b>						
<b>2011-2013</b>						
	<b># Apps.</b>	<b>% of Apps.</b>	<b># Denied</b>	<b>% Denied</b>	<b># Orig.</b>	<b>% Orig.</b>
<b>Conventional Home Purchase Loans</b>						
<b>Minorities</b>	1179	21.4%	142	12.0%	607	51.5%
<b>Whites</b>	3650	66.3%	335	9.2%	2101	57.6%
<b>Not Provided</b>	543	9.9%	102	18.8%	256	47.1%
<b>Not Applicable</b>	132	2.4%	1	0.8%	54	40.9%
<b>Home Improvement Loans</b>						
<b>Minorities</b>	156	19.1%	90	57.7%	45	28.8%
<b>Whites</b>	501	61.4%	215	42.9%	186	37.1%
<b>Not Provided</b>	141	17.3%	85	60.3%	27	19.1%
<b>Not Applicable</b>	18	2.2%	1	5.6%	2	11.1%
<b>Refinance Loans</b>						
<b>Minorities</b>	3409	16.1%	620	18.2%	1906	55.9%
<b>Whites</b>	13565	64.2%	1880	13.9%	8554	63.1%

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Home Mortgage Disclosure Act (HMDA) Analysis						
Comparison of Originations Within Categories						
HMDA Activity for Glendale, AZ						
2011-2013						
Not Provided	2716	12.9%	532	19.6%	1158	42.6%
Not Applicable	1444	6.8%	3	0.2%	27	1.9%
All Loans Purpose						
Minorities	4744	17.3%	852	18.0%	2558	53.9%
Whites	17716	64.5%	2430	13.7%	10841	61.2%
Not Provided	3400	10.6%	719	21.1%	1441	42.4%
Not Applicable	1594	5.8%	5	0.3%	83	5.2%

Table 59 also compares the denial and origination rates of whites and minorities. The data shows that the majority of loan applications across all loan types in Glendale were made by white households, 17,716 applications, followed by minorities (including those individuals who identified as Hispanic but not as white) with 4,744 applications. For all conventional loan types, applicants identifying as White and Not Hispanic made up 64.5% of the application sample size. The denial rate of these applications was 13.7%. Comparatively, Minority applications were only 17.3% of the application sample size and had a denial rate of 17.9%.

When broken down by conventional loan type, it is noted in the table that for home purchase loans, minority applications made up only 21.4% of the total applications and had a 12% denial rate, while Whites made up 66.3% of the total applications but only had a 9.1% denial rate. For home improvement loans, minority applications made up only 19.1% of the total applications and had a 57.6% denial rate, while Whites made up 61.4% of the total applications but only had a 42.9% denial rate. Home improvement loan data is again skewed by the small number of applications. Finally, for refinance loans, minority applications made up only 16.1% of the total applications in the market and had an 18.1% denial rate within the minority applications, while Whites made up 64.2% of the total applications but only had a 13.8% denial rate.

The data available on conventional loan types shows that despite minority applicants being a smaller portion of the sample size, they are being denied at a higher rate than White applicants. The data on minorities versus whites was further broken down by race/ethnicity group in Table 60 below:

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*Table 60. Comparison of Originations and Denials within Race and Ethnicity Categories - Glendale, AZ*

<b>Home Mortgage Disclosure Act (HMDA) Analysis Comparison of Originations and Denials Within Race and Ethnicity Categories Glendale 2011-2013</b>					
<b>Race &amp; Ethnicity</b>	<b>Number of Applications</b>	<b>Number of Originations</b>	<b>Percent of Originations</b>	<b>Number of Denials</b>	<b>Denial Rate</b>
<b>White</b>	15089	9471	62.8%	2088	13.8%
<b>Black or African-American</b>	419	241	57.5%	90	21.5%
<b>Hispanic</b>	2465	1347	54.6%	487	19.8%
<b>American Indian or Alaska Native</b>	90	45	50.0%	18	20.0%
<b>Asian</b>	1150	626	54.4%	189	16.4%
<b>Other</b>	74	44	59.5%	11	14.9%
<b>Not Provided</b>	202	104	51.5%	39	19.3%

As noted with all total loans, White applicants represented the largest number of loan applicants, 77.4%, with 15,089 applications. Origination rate for Whites was 62.8 percent. Hispanics (who did not identify as white) were the next largest applicant group with 2,465 applications submitted and an origination rate of 54.6 percent. Conversely, African-American origination rates were higher than Hispanics with a rate of 57.5 percent, but with only 416 applications reported. Asian applications came in third with an origination rate of 54.4 percent with 1,150 applications.

This suggests that there may be discriminatory lending based on race/ethnicity. In addition, any possible discriminatory practices appears to affect African -Americans most of all. As mentioned in the overall loan section, to make a definitive conclusion would require a greater degree of analysis taking into consideration other variables and characteristics that may be affecting the results.

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## **V. PUBLIC OUTREACH**

### **Introduction**

This section summarizes the results of the surveys, public meetings, and key person interviews conducted as part of the public outreach process for the Glendale AI. In addition, this section gives a brief overview of fair housing public outreach conducted by stakeholders in Glendale. The consultant conducted an online and written survey available to all Glendale residents, industry stakeholders, area Realtors, and lending institutions. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, experience with Glendale housing assistance and social service programs, and opinions about housing and social service needs in the city. ASK and City staff also directly administered surveys, conducted public meetings, and held key person interviews with housing providers and fair housing agencies.

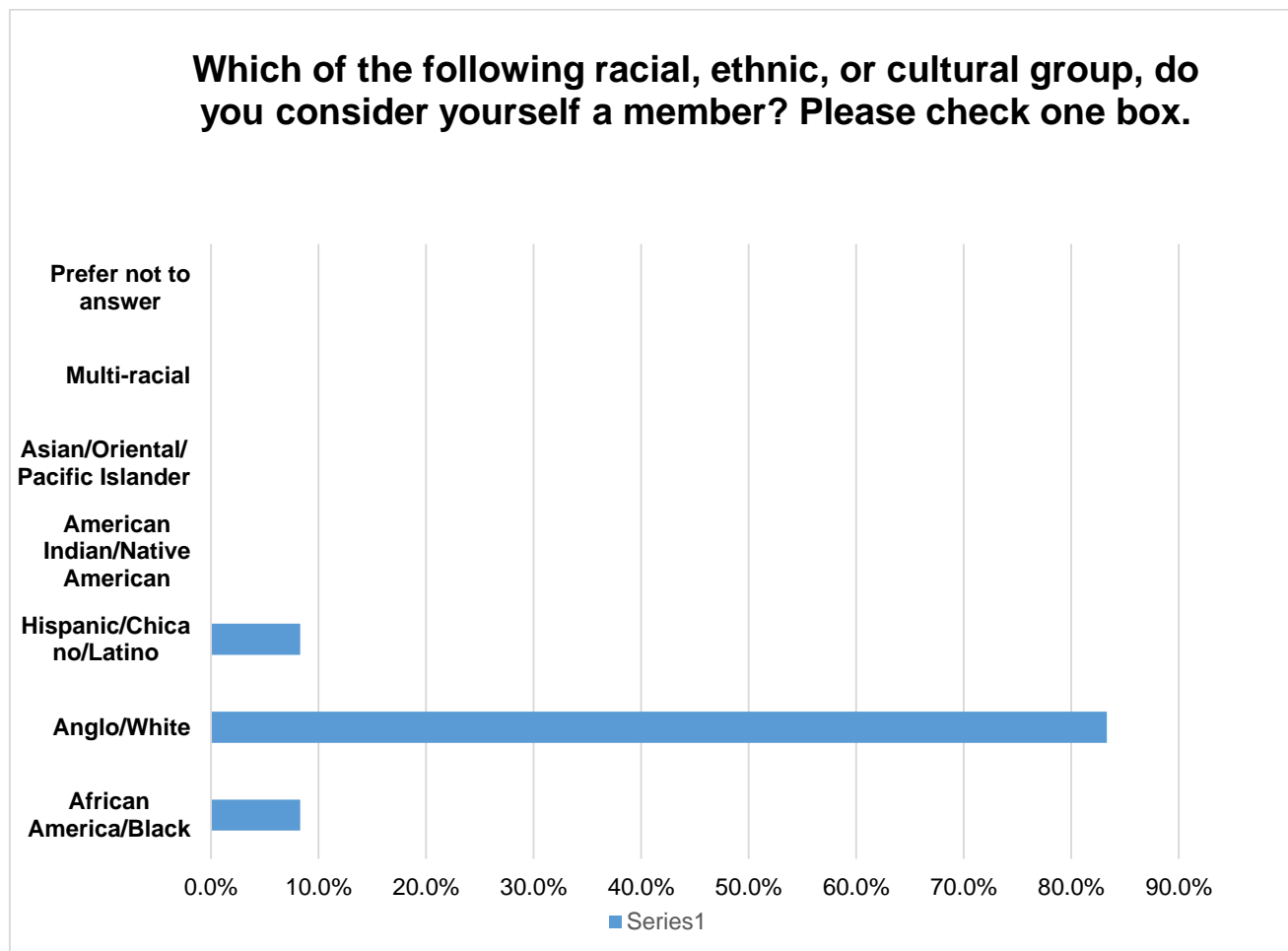
ASK developed fair housing surveys for residents, housing service providers, Realtors, and lending institutions. A Spanish language version of the survey was also available for residents. Copies of the survey were available in alternative format, upon request. A fair housing survey link was posted on the City's website at [www.glendaleaz.com](http://www.glendaleaz.com) and the City's Facebook page from September 23, 2014 to January 2015. Please refer to the Appendix section of the AI to view the survey instruments. The findings from these activities are discussed in turn.

### **Citizen Surveys**

An online, 25-question fair housing survey was designed by ASK and available for all residents to complete via <http://www.surveymonkey.com>, and as distributed by City of Glendale staff. The survey was opened on September 23, 2014, received responses through January 2015, and was completed by 14 Glendale area residents. There was also a Spanish version of this survey but no responses were submitted using the Spanish language version. The following tables and figures summarize the results of the survey.

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Race/Ethnicity



Of the residents surveyed, 10 persons (83.3%) are Anglo/White; 1 (8.3%) is African American or Black; 1 (8.3%) is Hispanic/Latino ethnicity; none are American Indian/Native American, Asian, or Multi-racial. In addition, no persons preferred to not answer or marked themselves as “Other”.

According to the 2010 Census, the racial makeup of the community was 67.8% Anglo/White; 6.0% Black or African American; 1.7% American Indian/Native American; 3.9% Asian; and 0.2% other races, including two or more (4.0%). Nearly 35% of the Glendale population identified themselves as being of Hispanic/Latino ethnic origin. Therefore, the survey respondents identifying themselves as Black and Hispanic/Latino ethnicity are the most underrepresented groups, according to actual population.

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Marital Status

Of the residents surveyed, 9 persons (75.0%) are married; 3 (25.0%) are single head of household; none are divorced, domestic partners or preferred not to answer.

Disability Status

Of the residents surveyed, 2 (16.7%) stated that they or someone in their household had a disability or handicap. Ten (83.3%) respondents answered that none had a disability or handicap.

Familial Status

The citizen survey asked respondents to state whether their household included children less than 18 years of age. Three persons (25%) answered that they had children under 18 years of age, and 9 (75.0%) answered that they did not.

Housing Discrimination

*Housing Discrimination Occurrence*

Areas in Which Housing Discrimination Can Occur	# of Respondents	% of Responses
Race	9	10.1%
Color	7	7.9%
Religion	9	10.1%
Sex	10	11.2%
Disability/Handicap	9	10.5%
Familial Status (family with one or more children under 18 years of age)	6	6.7%
National Origin	8	9.0%
Age	8	9.0%
Sexual Orientation	8	9.0%
Poor English Language Skills	2	2.2%
Citizenship Status	3	3.4%
Level of Income	3	3.4%
Source of Income (public assistance)	3	3.4%
Other (please list): if color is white	1	1.1%
Skipped Question	3	3.0%

Survey respondents were asked to identify ways in which housing discrimination can occur, based on a list of general categories. The majority of participants felt that sex was the most common area where housing discrimination can occur.

*Housing Discrimination Experience*

Have you or anyone you know ever experienced housing discrimination in the City?	# of Respondents	% of Responses
Yes, I have.	1	7.1%
Yes, a person I know has.	2	14.3%
No, neither me nor any person I know	8	57.1%
Skipped Question	3	21.4%

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As indicated in the table above, of the survey respondents, 1 person (7.1%) felt that they had experienced housing discrimination; 2 persons (14.3%) knew of someone who had; and 8 persons (57.1%) had not experienced housing discrimination (did not have first- or second-hand knowledge). Despite the small sample size these numbers reflect a significant enough portion of the survey group (21.4%) having first- or second-hand knowledge of housing discrimination. In addition, of these 3 persons who had first- or second hand experience of discrimination, 2 were the only Black and Hispanic identified participants in the respondent sample. Further analysis of responses will show where/how the discrimination occurred, which is important in pinpointing what/where impediments may exist in Glendale.

*Person/Organization That Discriminated*

Which of the following best describes the person or organization that discriminated against you or the person you know?	# of Respondents	% of Responses
rental property manager/multi-unit housing	0	0%
landlord of a single-family housing unit	1	25%
seller of a housing unit	0	0%
condominium or homeowner's association	0	0%
non-profit or for-profit housing services agency	0	0%
real estate professional	0	0%
loan officer or mortgage broker	0	0%
government employee (subsidized housing)	0	0%
public housing authority	0	0%
other (please list): Homeowner's Association	1	25%
Skipped question	2	50%

Of the 3 respondents who felt they were discriminated against, 2 respondents indicated the person/organization(s) they feel are responsible for housing discrimination. Respondents were able to select more than one response. Of these responses, 1 person (25.0%) indicated they felt they were discriminated by a landlord of a single- family housing unit and the other person (25.0%) indicated the source of discrimination was "Other" and listed a Homeowner's Association.

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*Location Where Discrimination Occurred*

What best describes the location of where the discrimination occurred?	# of Respondents	% of Responses
a rental apartment complex	0	0%
an individual housing unit for rent	1	25%
an individual housing unit for sale	1	25%
a real estate office	0	0%
a lending institution	0	0%
a public housing authority	0	0%
a county or city housing office	0	0%
a housing services agency office	0	0%
other (please list)	0	0%
Skipped question	2	50%

There were 2 responses that listed the location where housing discrimination occurred, and respondents were able to indicate more than one location. One respondent (25.0%) indicated that discrimination occurred at an individual housing unit for rent, and the other respondent (25.0%) indicated that discrimination occurred at an individual housing unit for sale. Based on the composite answers to this question and the previous questions, discrimination occurring at homes and apartments for rent and for sale are perceived as an impediment to fair housing choice in Glendale.

Survey respondents that experienced housing discrimination were asked to state the basis of such discrimination. The following responses were given:

*Basis of Housing Discrimination*

Basis of Housing Discrimination	# of Respondents	% of Responses
Race	1	20.0%
Color	1	20.0%
Religion	0	0.0%
Sex	1	20.0%
Disability/Handicap	0	0.0%
Family Status	1	20.0%
National Origin	0	0.0%
Age	0	0.0%
Sexual Orientation	0	0.0%
Poor English language skills	0	0.0%
Citizenship Status	0	0.0%
Level of Income	1	20.0%
Source of Income (public assistance)	0	0.0%
Other (please list)	0	0.0%

Of the two respondents who answered this question, Race, Color, Sex, Familial Status, and Level of Income were listed equally as the basis of housing discrimination (20.0% of responses respectively). These survey responses indicate that the discrimination occurred for reasons based on the protected classes and other areas of perceived discrimination, such as level and source of income. In addition,



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while level of income is not a federally protected class, it has the potential for disparate impact on members of the protected classes.

### Familiarity with Housing Programs and Fair Housing Law

Based on the survey results, less than half of Glendale residents are **not** well-informed about fair housing rights and responsibilities. 44.4% (4 persons) surveyed were not familiar with fair housing or social services provided by the City of Glendale. The remaining 56.4% (5 persons) were familiar with fair housing. In addition, nearly 22% of respondents (2 persons) have not seen/heard information regarding fair housing programs, laws, or enforcement within the City of Glendale.

Of the 14 respondents that answered the question regarding knowledge of Fair Housing laws, only 1 (11.1%) considered themselves to be Very Knowledgeable; seven (77.8%) as Somewhat Knowledgeable; and one (11.1%) as Not Knowledgeable. When asked if current fair housing laws and enforcement mechanisms are effective, 50% felt they are Very Effective, 25% felt that they are Somewhat Effective, and 25% felt that they are Not Effective. Given that half of the respondents said they thought the information available was somewhat to not effective, it is still recommended that the City specifically target making Glendale residents more aware of their fair housing options when planning to address impediments to fair housing choice.

In addition, over 22% of persons surveyed felt that there was inadequate fair housing information available in other language translations while 77.8% of respondents said they thought the information available was adequate. Given the low minority representation in the sample size and the lack of Spanish responses it is still recommended that the City specifically target fair housing outreach to minorities and persons with English as a second language when planning to address impediments to fair housing choice.

### Housing Choice and Housing Supply

When asked about the current impediments to fair housing choice in Glendale, 3 respondents recorded responses. One respondent felt they did not see any impediments to fair housing, while the other 2 respondents provided the following answers as impediments to fair housing:

- Lack of housing and enforcement
- The HOA in question refused to let my neighbor park his commercial vehicle in the neighborhood, even though down the street the same commercial vehicle is parked (but that neighbor works for a utility company). Due to my neighbor's employment, he had to make a choice between his job and our neighborhood. It is a labor, blue collar job and the HOA did not want his truck parked outside

Of the residents surveyed, 40.0% felt that housing choices are geographically limited to certain areas or neighborhoods in the City of Glendale, while 60.0% did not. The residents that felt that geographical limitations exist named the following reasons:

- I want to be close to the freeway
- Poor people are relegated to Ocotillo District and yet all of the monies that are raised in this district go North of Northern. Consequently, services in Ocotillo District are hard to come by.

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Of the ten respondents asked, 50.0% of respondents (5 persons) felt that affordable housing options are concentrated in certain projects/areas/neighborhoods, while the other 50.0% of respondents (5 persons) felt that affordable housing options are spread throughout the City of Glendale. When asked to identify the areas with concentrated affordable housing, the answers included the following:

- 85301, 85302, 85303
- 59th Ave and Glendale
- Downtown Glendale
- Ocotillo - Certainly the demographics of Arrowhead do not contain a mix of peoples.

When asked if they perceive certain geographic areas or neighborhoods within Glendale to be undesirable, the majority (66.7%) of respondents answered affirmatively (6 respondents). In addition, the undesirable areas were identified by those surveyed to include:

- Downtown Glendale
- Ocotillo
- Low income areas, where yards are unkempt.

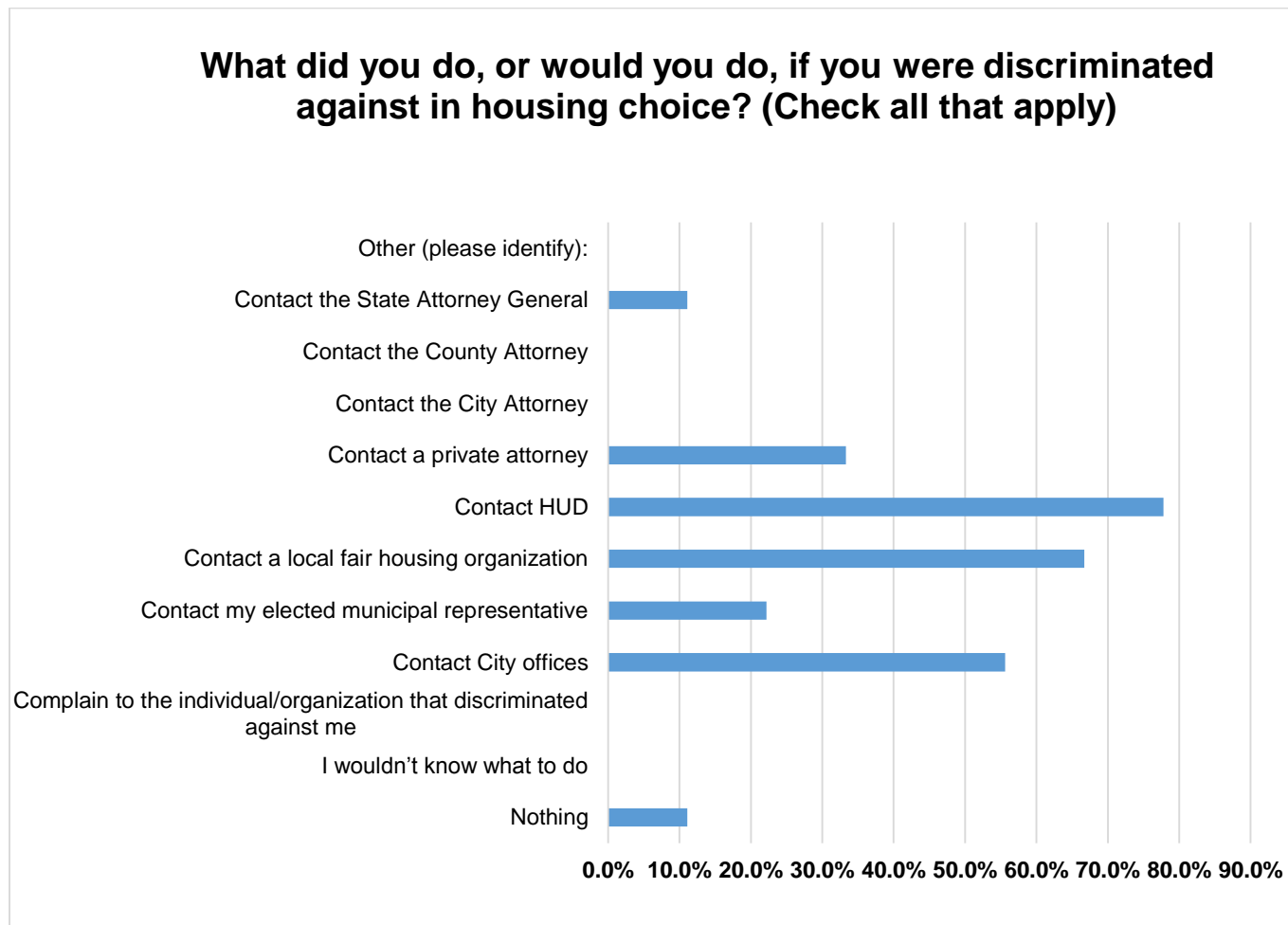
The survey asked if there was an adequate supply of affordable housing available to residents with disabilities, senior citizen residents, and residents with children. For residents with disabilities, 55.6% of respondents (5 persons) felt that there was not an adequate supply of affordable housing while 11.1% (1 person) felt residents with disabilities did have an adequate supply of fair housing. For senior citizen residents, 44.4% of respondents (4 persons) felt that there was not an adequate supply of affordable housing while 22.2% (2 persons) felt residents with disabilities did have an adequate supply of fair housing. Finally, for residents with children, 44.4% of respondents (4 persons) felt that there was not an adequate supply of affordable housing while 33.3% (3 persons) felt residents with children did have an adequate supply of fair housing. When asked to expand on why they felt this way respondent answers included the following:

- cost can be prohibitive
- I have no idea.
- Not enough housing for low- income individuals.

Based on these answers, the majority of respondents (including the only minority respondents in the sample size) felt that Glendale did not have adequate housing for residents with disabilities, senior citizen residents, and residents with children, and that potential impediments exist in Glendale that limit access to housing for many protected classes. The City of Glendale needs to closely analyze its policies and programs that assist the elderly, minorities, disabled, and families with children with the provision of affordable housing choices.

Fair Housing Education and Enforcement

*Actions Taken in Response to Housing Discrimination*



Of residents surveyed, the largest number of responders (7 persons, or 77.8% of all responses) answered that they would contact HUD if discriminated against in housing choice, and the next largest group (6 persons, or 66.7 %) answered that they would contact a local fair housing organization. Survey respondents were also able to write-in answers in the “Other” category, but no responses were recorded.

Residents were asked to indicate the most effective ways to inform residents about fair housing rights and/or responsibilities. The following answers were given:

*Ways to Inform Residents about Fair Housing Rights and Responsibilities*

Most Effective Ways to Inform Residents About Fair Housing Rights and Responsibilities	# of Respondents	% of Responses
Public meeting(s)	6	15.0%
Fair housing literature/information in public libraries and Municipal Center	8	20.0%
Television advertisements/announcements	6	15.0%
Radio advertisements/announcements	4	10.0%
Bilingual advertisements/announcements	5	12.5%
Information on the City's website	5	12.5%
Other (please describe)	1	2.5%
Skipped Question	5	12.5%

Of the 35 responses to this question (selecting more than one answer was allowed) only one respondent selected "Other". Their answer is recorded below:

- Better access to social services; the current set up is prohibitive to people who need help and only works well for those who know how to "use the system"

The survey concluded by asking what additional actions or changes to fair housing laws and practices would you suggest that the City of Glendale could take to address impediments and improve fair housing choice for all residents. One suggestion was included:

- Not allow HOA's to dictate where someone can work, which is akin to saying you cannot live here if you do not work in what we consider desirable, where the blue collar jobs may be worked by minorities.

These responses, in addition to the fact that 56.4% of respondents were familiar with fair housing, and that 88.9% of respondents said they were somewhat knowledgeable to very knowledgeable about fair housing demonstrate that the current fair housing information dissemination efforts are proving moderately successful. However, as the majority of the sample size identified as Anglo/White it would benefit the City of Glendale to expand on these efforts by increasing Public meetings, the creation and distribution of fair housing literature, English and bilingual radio and television advertisements, and by providing visible information on the City's website to help continue to keep the public informed of their rights and by specifically targeting more effort in minority areas.

### **Additional Surveys**

Additional online surveys and questionnaires were created for Housing Service Providers, Realtors, and Lending Institutions in the Glendale area via <http://www.surveymonkey.com>. These surveys were opened in September 2014 and available to area service providers, realtors, and lenders. At the time of publication, a total of 17 industry representatives had completed surveys.

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Realtor Surveys

The Consultant and City of Glendale staff emailed and invited Glendale real estate professionals to attend an informational AI meeting/feedback session, as well as fill out the fair housing survey. However, no real estate professionals have completed the survey to date.

Lender Surveys

The Consultant and City of Glendale staff emailed and invited Glendale mortgage lenders to attend an informational AI focus group/feedback session for realtors, lenders and housing providers, as well as fill out the fair housing survey. No lenders were in attendance at the focus group, and only one (1) lender completed a survey. The survey will remain open and more respondents are currently being recruited. The results of the focus group will be discussed in the Public Outreach section.

The lender surveyed felt they were Very Knowledgeable about Fair Housing Law. The survey asked a variety of questions regarding the practices and procedures of their businesses. The following answers were provided:

Questions to Mortgage Lenders	Yes	No
Does your company have written policies addressing Fair Housing Law?	X	
Do your marketing materials and/or display advertisements for soliciting borrowers include images of people of diverse racial/ethnic backgrounds?	X	
Does your company's marketing in the media include advertisements in languages other than English?		X
Does your company undertake any special marketing efforts to target minorities or low-income clients?	X	
Do you intentionally employ bilingual individuals on your lending staff in order to serve clients with poor English language skills?	X	
Has your company carved out a specialty/niche market in the City of Glendale?	X	
Does your company write mortgages for home purchases in minority or low-income neighborhoods of the City of Glendale?	X	
Does your company have a different fee structure, points, and/or interest rate quotes for mortgages on homes in minority and/or low-income neighborhoods?		X
Does your company have full-service branch offices located in minority and/or low-income neighborhoods in the City of Glendale?		X

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Questions to Mortgage Lenders	Yes	No
Does your company offer subprime loan products?		X
Does your company in policy or in practice deny loans to potential borrower clients on any of the following bases? (Race, color, religion, etc.)	Skipped	Skipped
Are certain groups of individuals perceived to be less desirable as borrower clients of your lending institution?		X
Does your company provide permanent mortgages for clients participating in public homebuyer subsidy programs such as HOME and Section 8 mortgages?		X
Does your company provide acquisition, construction, or predevelopment loans for developers of affordable housing, or housing in low- income neighborhoods, that may be using public subsidies?	X	
Do you perceive Federal, State, or local banking regulations as impediments to fair housing mortgage lending?		X
Have any groups or individuals filed complaints against your lending institution with any Federal, State, or local regulators, or initiated legal actions on the basis of fair housing discrimination?		X

Finally, the mortgage lender respondent stated that the current fair housing laws and enforcement mechanisms were Highly Effective.

#### Housing Provider Surveys

The Consultant and City of Glendale staff emailed and invited Glendale housing providers to attend an informational AI meeting/feedback session, as well as fill out the fair housing survey. A total of 4 housing providers completed a survey. One respondent worked with the development and/or sale of housing, including affordable housing; and two respondents worked with fair housing advocacy. The last remaining respondent chose not to include the services their organization provided. All four survey respondents felt that they were just Somewhat Knowledgeable of fair housing laws, including Arizona fair housing law.



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Questions for Housing Service Providers	Yes # and %	No # and %
Does your agency assist with fair housing complaints?	0	4 100%
Do you have any materials displayed to promote fair housing?	2 66.7%	1 33.3%
Have you or your staff received any fair housing training?	2 66.7%	1 33.3%

Although the housing providers surveyed do not assist with fair housing complaints, one respondent was aware of an incident of housing discrimination complaint reported due to the actions of a rental property owner/manager. Additionally, one respondent commented that they refer all complaints to the Attorney General's office but do provide complaint form and assistance.

When asked to identify impediments to fair housing choice in Glendale, the housing service providers stated that lack of knowledge and lack of housing for persons with disabilities were impediment to fair housing choice.

Two survey respondents felt that residents perceive certain geographic areas or neighborhoods within the City of Glendale to be undesirable, but two survey respondents did not. When asked to describe the areas perceived as undesirable, one respondent commented that they had heard of residents thinking this in casual conversations but did not have a specific location.

Housing providers were asked to identify appropriate actions for clients who have experienced housing discrimination. Only the following actions were identified as options:

- File complaint with the individual/organization that discriminated
- Seek Tenant/Landlord Mediation
- Contact City offices
- Contact a local fair housing organization
- Contact HUD
- Contact the City Attorney
- Contact the State Attorney General.

Two respondents recommended education, enforcement, and the support/funding for persons with disabilities for improving fair housing choice.

Upon analyzing all survey responses from residents, real estate professionals, and housing service providers, it is clear that the lack of fair housing education and enforcement in the rental community, as well as within the minority community, serves as an impediment to fair housing choice.

## **Public Participation in the AI**

The City of Glendale conducted an inclusive community participation process that incorporated input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. The consultant developed fair housing surveys for residents, housing service providers, realtors, and lending institutions. Surveys for residents were also provided in Spanish. Website links to the four fair housing surveys were posted on the City's website and distributed via emails and flyers.

The surveys were used to gather information about respondents' experiences and perceptions of housing discrimination and their opinions of City of Glendale's fair housing laws and services. In addition, public notices providing for reasonable accommodation and alternative formats for information were offered to persons with Limited English Proficiency and persons with disabilities, including the hearing-impaired.

These public meetings were advertised on the City's website and in newspapers of general circulation. Copies of notices are attached. The public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the City, various industry representatives and service providers, and the public stakeholders at large. Additional information was gathered via teleconferences and email correspondence with nonprofit and advocacy groups. Staff of the City of Glendale Community Revitalization Department actively participated in development of the AI. Accommodations were made for persons with physical disabilities.

Interviews were also conducted with key individuals from City staff, non-profits, HUD, and housing providers to collect additional information about fair housing practices and impediments in the City.

The draft AI was published for a 10-day comment period from April 20-30, 2015 on the City's website and made available at the City's Community Revitalization Office at 5850 W. Glendale Drive. No comments were received. See attached copy of newspaper ad for public notice as Appendix #4.

## **Focus Groups**

In order to elicit input on public perceptions of the impediments to fair housing choice and housing discrimination in Glendale, focus group meetings were held on October 15, 16, and 17, 2014 with the following groups:

- Realtors, lenders, property managers, and other housing providers.
- Housing providers and advocates, as well as community housing development organizations meeting the needs of low income families, persons with HIV/AIDS, homeless, and persons with disabilities.

All meetings were held at the Glendale City Council chambers. The focus group meetings were also advertised on the City website, via email, in Glendale newspapers, publicized on the City's TV channel, the local radio station, as well as the City's Facebook page.

At each session, the meeting attendees were educated on the purpose of the AI and the process to be used. Participants were asked to identify housing choice issues that were of particular concern to them

and their comments were recorded. In addition, members of the general public, as well as representatives of various community groups were invited to a public meeting held on Thursday, October 16, 2014.

### **Discussion from Focus Groups, City Officials, and Public Meetings**

Discussions regarding fair housing choice in focus groups, key person interviews, public meetings, and with City staff resulted in the following observations. Several issues that limit housing choice but did not fall under the protection of the Fair Housing Act were raised by participants and interviewees.

A summary of responses and discussions from the focus group and public meetings are provided below.

#### **General Comments:**

- Difference in levels of awareness related to fair housing due to:
  - Not knowing where to report discrimination
  - Lack of clarity about what constitutes discrimination
  - Some cases do not rise to the level of litigation
  - Nuances regarding what constitutes discrimination.
- Section 8 vouchers. There is a need to review the system for voucher distribution.
- There have been some complaints regarding persons with disabilities living in group homes in some neighborhoods. However, in some instances these individuals are embedded and neighbors are often unaware of their presence. Nimbyism sentiment.
- Major challenges involve people not being able to pay rent.
- Need for deliberate enforcement to ensure fair housing compliance.
- Affordable Housing in Glendale is viewed as a cyclical market. Competitive market creates challenges for affordable housing developers.
- The City partnered with some organizations to deal with predatory lending.
- Education is important to increase understanding of the distinction between fair housing concerns and other types of housing issues,
- More effort is needed by the State to disseminate public information on fair housing issues.
- Suggestions regarding most appropriate ways to inform are: cable, HUD settlement cost booklet used to point client to resources. Provide a booklet as part of application, Legal Aid package.
- City is in the process of reviewing its Comprehensive Plan.
- 2008 – The City conducted a strategic housing study but it has not been updated.

#### **ADA and Housing for Persons with Disabilities:**

- Housing affordability has an impact on the mentally ill because of their low income.
- Issue of zoning that affects group homes, No concrete actions – review zoning ordinance (no actions taken) – Update ADA requirements.
- Group Homes – not wanted in some neighborhoods. Homeowners Associations resistance.

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- Of persons with disabilities, only about 10% are living in independent housing. Most live with family. Need for independent living options for young adults with disabilities. Insufficient accessibility. High demand.
- Increase in mental disabilities, especially among veterans.

**Transportation:**

- Transportation – schedules not extensive enough. Late public transportation coming from employment centers at night.

**Additional Community Outreach**

Additionally, in June 2014, two community presentations regarding Fair Housing Laws were held at the Glendale Main library to which members of the general public, as well as representatives of various community groups were invited. The presentations addressed the following topics:

- Who is protected under the Fair Housing Laws?
- What acts constitute unlawful discrimination by apartment owners, landlords, or sellers?
- What are the obligations of public housing agencies?
- How to report a Fair Housing violation.
- Foreclosure defenses and predatory lending

**Key Person Interviews**

In conjunction with the surveys, ASK conducted key person interviews person-to-person, by teleconference, and via email correspondence with members of the City of Glendale staff as well as nonprofit and advocacy groups.

**Key Person Interview Participants**

Organization	Key Person	Title
Habitat for Humanity	Roger Schwierjohn	President/CEO
Neighborhood Housing Services of Phoenix	Patricia Garcia Duarte	President/CEO
Southwest Fair Housing Council	Jay Young	Executive Director
HUD Field Office	David Uihertio	CPD Representative
Maricopa Association of Governments/ Elderly and Persons with Disabilities Transportation Committee	Matt Dudley	Committee Chairman
Glendale Public Housing Department	Elaine Adamsyck	Manager, Glendale Housing Services
Community Legal Services	Stan Silas	Attorney

Below is a description of some of the agencies and a summary of fair housing issues discussed.

### **Neighborhood Housing Services of Phoenix**

- NHS is an Arizona non-profit organization that provides housing counseling and education, develops real estate, and is also a Community Development Financial Institution (CDFI) which makes loans to homebuyers. The organization serves all of Maricopa County, and in the last three years has assisted over 600 Glendale residents in the areas of foreclosure prevention, homebuyer assistance through the Neighborhood Stabilization Program, down payment and closing cost assistance, and homebuyer education.
- NHS is a HUD-approved housing counseling agency, and any reports of fair housing discrimination are referred to HUD or to the State Attorney General.
- The main barriers to fair housing in Glendale are residents not understanding their rights. NHS has received reports of landlords requesting information/documentation that is not required in a lease application with the intent of discriminating against immigrants.
- The best way to inform residents about fair housing rights is to increase marketing in order to raise awareness. Consider outlets such as television and social media for more interactive content.

### **Habitat for Humanity Central Arizona**

- Habitat for Humanity assists low- and moderate-income persons to become homeowners by primarily building affordable housing. The organization serves families in Glendale as well as Avondale, Apache Junction, Chandler, Gilbert, Guadalupe, Mesa, Peoria, Phoenix, Surprise, and Tempe. Habitat has built close to 120 homes in Glendale and works as a contractor for the City under the Emergency Home Repair Program.
- Habitat for Humanity does not address fair housing issues, however, as a recipient of CDBG and HOME funding from the City, sub-recipients and partners are required to abide by the fair housing laws. Habitat provides homebuyer classes and addresses fair housing with materials provided by the City and by HUD.
- A barrier to fair housing is access to resources and funding.
- In terms of keeping City residents informed of their fair housing rights, the challenge for the City has been to find a convenient venue and time for residents to attend fair housing workshops.

### **Southwest Fair Housing Council**

- Has carried out one fair housing training event in the City of Glendale.
- No current referrals or complaints.
- City uses web link to the Council.
- Council conducts systematic fair housing testing.
- Council has insufficient data to determine main impediments in the City.
- Recommends use of CDBG and/or other funding to provide education, outreach, and enforcement activities in regard to fair housing

### **HUD Field Office**

- Reviewed historical background to segregation in the metro area.
- Concentration of affordable housing and vouchers in minority areas is an important concern
- HUD expects patterns of segregation to be alleviated.

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- Lack of affordable housing not an impediment itself. Must be viewed in relation to fair housing.
- Discrimination complaints from the City of Glendale are not as prevalent as from other areas.
- Recommend regional approach be taken in addressing fair housing and related issues.

### **Glendale Public Housing**

- Briefing meetings are held for tenants and new landlords.
- The Department is in the process of developing an annual review for landlords within 12-16 months.
- Accommodations made for persons with mental disabilities and attempts are made to work with clients in co-operation with Community Bridges, Magellan, and Veterans Administration.

### **Community Legal Services**

- Education and awareness is needed; multiple visits made to events in the City at which fair housing was addressed.
- Discrimination in the area of reasonable accommodations is most prevalent.
- Existence of lending community discrimination – Hispanics targeted (e.g. in the use of trustees). Often sales disclosure info not provided to them. Evident in mobile home and low- income housing sector transactions.
- Not enough resources at the State level to provide adequate fair housing services.
- Referrals are received from the City as well as through the Attorney General's office.
- Website link from City to Community Legal Services and to Attorney General's Office.

### **Consultation Meetings with City Staff**

Meetings were held with City staff and officials to get input on fair housing and discrimination issues. Consultations were held with the following persons:

- Gilbert Lopez, Revitalization Manager, Community Revitalization Division
- Mona Francis, Revitalization Supervisor, Community Revitalization Division
- Charyn Palmisano, Revitalization Supervisor, Community Revitalization Division
- Elizabeth Garcia, Revitalization Coordinator, Community Revitalization Division
- Erik Strunk Executive Director, Human Services Department
- Jon Froke, Planning Director, Planning Division
- Mathew Dudley, Transit Planning Manager, Transportation Department
- Tamara Ingersoll, Marketing/ Manager Communications, Communications Department
- Steve Dudley, Building Safety Manager
- Sam McAllen, Executive Director of Development Services
- Rebecca Daniels Manager, Community Action Program
- Tamara Ingersoll IPO Communications Department

The staff members were asked a number of questions about the status of fair housing, affordable housing, and community service needs in Glendale. Discussion and responses from City Staff are included in various sections of this report.



## VII. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

### Introduction

The City of Glendale's 2011 AI identified impediments to fair housing choice and provided recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review the impediments and action plan identified in the City's 2011 AI and the status of those impediments.

This section will also review any current impediments identified through this 2015 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City. The recommendations will consist of both reactive and proactive actions to address the impediments, ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. In order to develop a viable implementation plan, the City may view the recommendations as a framework for addressing the impediments, as a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

### Update to 2010 Previous Impediments and Recommendations

The City of Glendale staff completed a matrix on the status of previous impediments identified in 2010. The matrix provided a list of the key impediments identified in the city at that time and the proposed activities/actions that the city could carryout to address the impediments. Based on a review of the matrix, the City still considers some impediments as being relevant. There were some proposed actions that were not completed. Information on the city's activities/proposed actions, current status, and activity funding to address key impediments to fair housing choice are provided below and in Appendix #2.

**Previous Impediment #1:** Inadequate access to fair housing education and lack of an adequate fair housing discrimination reporting system.

#### Previous Recommendation(s):

- a. **Recommendation #1:** Dedicate a portion of the City's website to fair housing, with direct links to websites with information about filing fair housing complaints.
- b. **Recommendation #2:** Expand the City's fair housing campaign, with a goal to increase citizen's knowledge about where to report fair housing complaints. Utilize radio, television, public presentations, flyers, newspaper ads, and make fair housing presentations at community events.
- c. **Recommendation #3:** Facilitate access to the City's cable television channel(s) as a source of fair housing information and public education efforts.
- d. **Recommendation #4:** Expand fair housing educational workshops and materials to the West Maricopa County Regional Association of Realtors, local realtors, and other housing providers.
- e. **Recommendation #5:** Continue to dedicate and increase funds from CDBG and other sources to fair housing education, outreach, and enforcement.

**Current status:** The City of Glendale now has a direct link on its Community Revitalization website to [azfairhousing.com](http://azfairhousing.com), a website dedicated to fair housing issues. Each year the City provides funding to Community Legal Services (CLS) to promote and provide legal assistance related to fair housing.

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The City partnered with CLS to hold fair housing events in June 2013 and 2014. CLS also held a series of workshops to educate housing providers and the general public about fair housing issues. As a result of these workshops, there have been some one-on-one consultations with citizens by CLS Attorneys. The City also funded the development of the 2015 AI.

**Updated Recommendation(s):** The City has made significant strides in informing residents of Glendale about fair housing rights and how to report potential cases of discrimination. However, lack of fair housing education remains an impediment especially for minorities.

**Previous Impediment #2:** Discrimination related to rental and owned properties.

**Previous Recommendation(s):**

- a. **Recommendation #1:** Distribute fair housing materials to community centers, libraries, social service providers, housing authority offices, and private housing developments.
- b. **Recommendation #2:** Create and distribute a Tenant-Landlord Handbook for Glendale citizens.
- c. **Recommendation #3:** Establish and conduct mandatory orientation sessions on fair housing for landlords under the housing authority's Section 8 rental program.
- d. **Recommendation #4:** Provide CDBG funding for fair housing testing activities.
- e. **Recommendation #5:** Secure fair housing testing data for Glendale by contracting with CLS and establish a specific time for review and analysis of the data.
- f. **Recommendation #6:** Ensure that ongoing reporting data is monitored for areas of existing discrimination and trends.
- g. **Recommendation #7:** CLS should provide the City with a more accurate breakdown of its cases, as well as an analysis of the type of bias experienced for each case.

**Current status:** The City currently distributes fair housing information in the Community Revitalization lobby, public libraries, Community Housing, and in the City's Park and Recreation Centers. Community Housing conducts mandatory orientations with new landlords. Fair housing testing data was not secured and analyzed as recommended. The reports on fair housing complaints from CLS are not detailed in terms of basis of discrimination in fair housing complaints.

**Updated Recommendation(s):** The community input from the study suggests that the City is already taking several actions to disseminate fair housing information, but other methods to be explored include the use of social media to reach more residents, and also, making public meeting and workshops more accessible by having meetings at more convenient times. The City should request more detailed reports from CLS that shows the basis of fair housing complaints.

**Previous Impediment #3:** Lack of sufficient affordable housing choices.

**Previous Recommendation(s):**

- a. **Recommendation #1:** The City should implement a plan to continue to fund affordable housing needs and leverage those funds with other funds.
- b. **Recommendation #2:** The City should apply for additional HUD Section 8 vouchers, as they are available.
- c. **Recommendation #3:** Increase citizen's awareness of social services and housing assistance programs available to them through additional marketing of programs.
- d. **Recommendation #4:** Increase funding for housing counseling services and leverage resources such as scholarships to NeighborWorks training. Also, work with local financial institutions to sponsor housing counseling certification.

**Current status:** The City plans for the provision of affordable housing in its Five-Year Consolidated Plan and Annual Action Plan. As previously mentioned, the City contracts with CLS to promote fair housing awareness and distributes fair housing information at numerous locations in the City and on the City's website. In regards to housing counseling services, the City utilized a portion of its NSP1 and NSP 3 funds for housing counseling services. New homebuyers were required to complete an eight hour HUD certification class prior to purchasing NSP properties.

**Updated Recommendation(s):** More recent housing data including CHAS data indicates that there is still a shortage of affordable housing in Glendale. The City should continue to implement the recommendations above to encourage the development of new affordable housing units as well as continue to utilize CDBG and HOME funding to provide and preserve affordable housing.

**Previous Impediment #4:** Lack of accessible housing.

**Previous Recommendation(s):**

- a. **Recommendation #1:** Provide builders with information packets regarding ADA requirements and post ADA requirements on the City's website; incorporate ADA requirements in the development, review, and permitting process for regular single-family construction.
- b. **Recommendation #2:** Retain information on ADA and the Fair Housing Act in the 2011 revision of the City's Zoning Ordinance and Commercial Design Guidelines.
- c. **Recommendation #3:** Consider addressing the apparent deficit of ADA accessible affordable housing by having the Glendale Commission on Persons with Disabilities conduct a comprehensive review of ADA accessible housing supply and demand to support the development and/or retrofitting of additional ADA accessible units.
- d. **Recommendation #4:** Continue to enforce the Arizona Americans with Disabilities Act and the associated guidelines.

**Current status:** The City's Design Guidelines still require ADA compliance, and in 2011, the City in partnership with Gorman and Company, constructed a 28-unit ADA compliant apartment complex as part of the City's Centerline Redevelopment effort. In addition, the City allows ADA modifications through the Single-family Rehabilitation Program and through the Glendale Home Modification Program. The Glendale Commission continues to have ongoing dialogue in regards to the supply of accessible housing throughout Glendale and actions that can be taken to encourage the development of additional units. The City continues to include staff on the Commission on Persons with Disabilities.

**Updated Recommendation(s):** The City should continue to strive to increase the supply of accessible housing units. The City should review its policies including the zoning code to determine if there are any requirements or conditions that limit the supply of housing for persons with disabilities or elderly persons. Also, the City should continue to fund the rehabilitation of single- family housing units and support accessibility modifications.

**Previous Impediment #5:** Inadequate public transportation.

**Previous Recommendation(s):**

- a. **Recommendation #1:** Increase funding and support for transportation initiatives to provide better access to housing opportunities and employment opportunities.
- b. **Recommendation #2:** Continue to be part of efforts to improve public transportation in the Phoenix MSA in an effort to strengthen the employment, transportation, and housing links in Glendale and the surrounding areas.

**Current status:** The City is a member of the Regional Transportation Authority and is involved in the planning efforts to expand public transportation services throughout the Phoenix MSA. The City is also involved in planning and discussions regarding linking the Centerline area with other transportation corridors that will allow access to employment and healthcare providers.

**Updated Recommendation(s):** The City should include transportation needs for low- and- moderate income persons, persons with disabilities, and other special needs populations in its transportation planning efforts.

**Previous Impediment #6:** Lack of formal mechanisms for regional solutions to fair housing issues.

**Previous Recommendation(s):**

- a. **Recommendation #1:** Support the establishment of a metro area Fair Housing Advisory Committee that will include a regional approach to fair housing issues and education.
- b. **Recommendation #2:** The City should continue proactive code enforcement policies and practices.

**Current status:** The Maricopa County Consortium is currently working on formulating an Analysis to Fair Housing Plan on a regional basis that recognizes the uniqueness of each individual Member City. The City continues to utilize CDBG funds for costs related to code enforcement activities in low- and moderate-income areas.

**Updated Recommendation(s):** The City should collect and maintain demographic data and socioeconomic characteristics of Glendale residents as well as data of housing supply and availability to ensure that, as plans are developed, the goals and objectives formulated are based on reliable information and account for all protected class members. The City should pursue regional fair housing initiatives through the HOME Consortium, where practical.

## **Current 2015 Impediments and Recommendations**

Based on the research and data available, the following are the current impediments to fair housing choice in both the public and private sectors which were identified in the AI. It must be noted that there are some impediments that were previously identified that are also identified in this current list. For each impediment, recommendations were formulated to address them and are listed below.

**A. Impediment:** *Residents face challenges accessing public transportation, especially special needs population members including persons with disabilities and homeless persons.*

**Action:** *Increase access to public transportation and transit services for low- and moderate- income persons, persons with disabilities, and other protected class members.*

### **Recommendation #A-1**

When conducting transportation planning and seeking funding opportunities to improve public transportation and infrastructure, the City should ensure that consideration is given to the transportation needs of protected class members as well as low- and moderate- income persons. Attention should be given to the cost of utilizing transit services, service areas, availability and time of routes, fleet size for alternative transit services such as Dial-A-Ride, and access to employment opportunities.

**Status:** Valley Metro currently provides public transportation and other transit services in the City of Glendale. The services are provided at reasonable rates and reduced rates are available for senior, persons with disabilities, and Medicare card holders. According to a Valley Metro Operations Statistics report, 50% of Glendale's population resides within ¼ mile of a bus route. Even with the current level of service, the City's Consolidated Plan identified the need for transportation services as a high priority.

**B. Impediment:** *Shortage of affordable and accessible housing to meet the needs of persons with disabilities, elderly persons, families with children, and other protected classes.*

**Action:** *The City of Glendale needs to closely analyze its policies and programs that assist the elderly, minorities, persons with disabilities, and families with children with the provision of affordable housing choices.*

**Recommendation #B-1**

Consider accommodating group homes under the same standards as other residential uses> Ensure that restrictions on the citing of group homes does not exclude housing for persons with disabilities from residential areas, and does not put any undue hardship on operators of group homes.

**Status:** The City of Glendale imposes conditions of group homes that may limit the availability of such housing for individuals with disabilities. Group homes should be held to the same regulatory requirements as occupants of other residential dwelling units. However, group homes are classified based on the number of residents and are permitted in zoning districts (single-family vs multifamily) based on their capacity. The Zoning Ordinance also stipulates that group homes cannot be located within 1,320 feet of another group home. The location of group homes must be approved by the Planning Department and an administrative record of all group homes is maintained by Planning. The administrative review process for approval of a group home includes completion of an application and submittal of required items to the Planning Director to ensure that all requirements are met. The process typically takes ten business days from application completion. If the application is denied by the Planning Director, the decision may be appealed at the Board of Adjustment after a written notice and payment of the appeal fee.

**Recommendation #B-2**

In order to maintain or increase the level of homeownership in Glendale, the City should support the provision of services including housing counseling, credit counseling, foreclosure prevention counseling and financial assistance with the goal of reaching and increasing the number of minorities and low- and moderate- income households.

**Status:** Some of the affordable homeownership stock in the City of Glendale is being reduced by foreclosures in minority concentrated areas. An analysis of the foreclosure rates throughout the City indicated that foreclosures occurred at higher rates in lower income areas and were not attributed to predatory lending practices or other discriminatory housing practices, but more likely attributable to personal circumstances such as unemployment, underemployment, or creditworthiness.

**Recommendation #B-3**

The City should work towards increasing leveraging, as far as possible, with private sector funds and other public funding to fund the development of a variety of affordable housing units suitable for different types of households. The City should also implement land use policies which encourage the construction of affordable and accessible housing for lower income families.

**Status:** Input gathered from residents and housing providers in Glendale indicated that there is a lack of resources to produce an adequate supply of affordable housing options. CHAS data also supports the need for an increase in the affordable housing stock. Minority populations, specifically Hispanics, are also disproportionately impacted by cost burden. The City should continue to fund affordable housing needs through the housing rehabilitation and repair programs to assist in the preservation of the existing affordable housing stock.



***C. Impediment: Discriminatory lending practices may be disproportionately impacting minority populations based on loan denial rates.***

***Action: The City should work with lenders in Glendale and request that they review their underwriting standards to determine that loan decisions are being made equitably.***

**Recommendation #C-1**

The City should coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

**Status:** It appears based on the review of HMDA data and the denial rate in minority census tracts, there may be discriminatory lending occurring in Glendale. If, after closer examination of the data, racial disparities are found to exist, the City and its partners should provide fair housing training to loan originators and underwriters and consider creating a committee to conduct continuous review and monitoring of residential loan products.

***D. Impediment: Lack of or inadequate fair housing education and enforcement in the rental community, as well as within the minority community and to persons with disabilities.***

***Action: Continue fair housing education and outreach, and expand opportunities for fair housing training.***

**Recommendation #D-1**

The City of Glendale should expand its fair housing education and outreach efforts by increasing the number of public meetings, the creation and distribution of fair housing literature, English and bilingual radio and television advertisements, and more visible information on the City's website to help continue to keep the public informed of their rights and specifically increase efforts in minority areas.

**Status:** The City has had success with educating residents of the fair housing rights and responsibilities, as indicated by results of the fair housing surveys. However, very few survey respondents were minorities, therefore, the City should increase outreach to minority populations especially persons of Hispanic/Latino ethnicity since this is the fastest growing segment of Glendale's population.

**Recommendation #D-2**

The City should facilitate access to the City's cable television channel(s) as a source of fair housing information and public education efforts.

**Status:** This was a recommendation to a previously identified impediment where no action has been taken by the City. Current input through key person interviews and other methods still suggest that television is an effective medium to disseminate information on fair housing.

***E. Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.***

***Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.***

**Recommendation #E-1**

The City of Glendale should work with its partners to promote education and awareness about mental disabilities and encourage its public housing Division to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

**Status:** The City's Community Housing Division is aware of the issue of mental disabilities and potential loss of housing and has made adjustments to assist persons who may be affected. For example, a person with a mental disability may lose housing because they have not heeded recertification notices due to hospitalization or failure to follow directions due to disease.

***F. Impediment: Lack of awareness of the demographics and needs of protected class members in the City's planning process may hinder proactive responses to housing needs and choices.***

***Action: Align planning efforts to reflect the changing demographics of the City and ensure the needs of all residents are considered.***

**Recommendation #F-1**

The City should include protected class demographic data in its planning process, including data on mental disabilities, if available.

**Status:** The City's planning documents do not focus on demographics of protected classes. Such a focus will guide the actions and decisions to provide housing in the City

**Recommendation #F-2**

The City should review its planning concepts of affordable housing and diverse communities contained in the Comprehensive Plan and develop strategies to make these more of a reality using HUD resources and best practices from other communities.

**Status:** The City's Comprehensive Plan and other documents use language regarding the ideals of affordable housing and a diverse community. However, there are not enough concrete strategies to further those goals and intentions. As mentioned previously in this report, HUD has established a Regulatory Barriers Clearinghouse as part of its America's Affordable Housing Initiative to assist cities with proactively addressing affordable housing choice through reviewing and removing any regulatory barriers developing strategies to meet affordable housing needs, and foster fair housing choice. The clearinghouse also provides shared best practices from across the country.

## **VIII. FAIR HOUSING PLANNING**

### **Fair Housing Action Planning Framework**

In response to the impediments identified and recommendations to address them contained in this report, the City of Glendale Community Revitalization Division is tasked with coordinating the development of a Fair Housing Action Plan in accordance with Chapter 2 of the HUD Fair Housing Planning Guide: Volume 1. In light of constrained federal, state, and local budgets, Glendale, like many other jurisdictions, may not have all of the resources that will be needed to carry out the recommendations contained in this report. The recommendations are intended to serve as a basis for fair housing planning by the City. Priorities will have to be determined, goals established, and human and financial resources as well as partnerships identified to ensure that the City addresses fair housing choice issues raised in the study.

As a member of the Maricopa HOME Consortium, the City of Glendale will seek to work on regional fair housing approaches with other Consortia members.

The City will review and provide a response to each recommendation in the “Staff Response” column of the Action Plan matrix attached as Appendix #3. The table also includes columns where City staff will indicate the specific actions to be undertaken to address each impediment based on the resources available to the City and established priorities. A timeframe for implementation of the actions will also be prepared as determined by the City, consisting on one, three, and five-year increments as well as activities that will be carried out on an ongoing basis over the five years covered by the City’s Consolidated Plan. There are some resources, partnerships, and systems that are currently in place and can be deployed in the short term while other issues may have to be addressed over a longer time period. The Fair Housing Action Plan will be developed with input from City Council, City Departments that participated in the AI process, the City’s Manager’s office, housing providers, realtors, lenders, non-profits, fair housing advocates, the general public, and participating HOME consortium members.

The following steps are proposed for the fair housing planning process:

#### **1. Communicate AI Results**

Upon completion of the AI, the City will communicate the results of the AI to the public and all stakeholders through the following means:

- Print copies of the AI and provide to locations such as community centers, libraries, and City hall for the public to review;
- Communicate conclusions and recommendations to policy makers, planners, key city staff, community organizations, and the public;
- Provide access to a copy of the AI on the City’s website;
- Provide a means other than public forums for other citizen participation (e.g. written comments, comments via electronic and social media) regarding the conclusions and recommended actions resulting from the AI;
- Utilize alternative formats (e.g. braille, large type, tapes, or readers) for persons with visual impairments; and

- Solicit broad-based community support for developing the fair housing action plan in order to meet the City's certification to "affirmatively further fair housing."

## **2. Set up Structure for Action Planning to Eliminate Identified Impediments**

Prior to taking actions to address the identified impediments, the City should prepare the community for the process as follows:

- Develop a system for diverse community groups to be involved in the fair housing action plan development process;
- Create a structure for the design and implementation of the actions, or incorporate the design and implementation of housing and community development activities;
- Determine which local and County partners subrecipients at the local and County levels, and City departments will have primary and secondary responsibilities for designing and carrying out activities; and
- Ensure that partners and subrecipients solicit input from community stakeholders.

## **3. Establish Fair Housing Objectives and Goals**

In determining actions to be taken to successfully address the impediments identified in the AI, the City should define a clear set of objectives with measurable and achievable results. According to the HUD *Fair Housing Planning Guide*, "the objectives should be directly related to the conclusions and recommendations contained in the AI. For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective."<sup>11</sup>

## **4. Determine Fair Housing Actions**

The HUD *Fair Housing Planning Guide* outlines the following steps for determining fair housing actions which shall serve as guide for the City of Glendale:<sup>12</sup>

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities.
- Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities.

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<sup>11</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

<sup>12</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

- Schedule actions for a time period which is consistent with the City's Five- Year Consolidated Plan cycle.

### **Fair Housing Implementation Tracking**

The City's Community Revitalization Division is responsible for the oversight and tracking of the implementation of the fair housing action plan. The Community Revitalization Division will track the progress of the actions to address impediments to fair housing choice. The purpose of the implementation tracking is to analyze the impact of the actions taken and demonstrate that the City has met its obligation to affirmatively further fair housing. This section describes the process for tracking the City's progress in carrying out the recommendations to address the impediments to fair housing choice.

### **Ongoing Self-assessment**

It is recommended that the City conduct an ongoing self-assessment at mid-year to determine its progress in addressing the identified impediments and recommendations. The City's fair housing activities will be compared to the timelines stipulated in the fair housing action plan. If the City notices any deviations from the timeline, it should take the necessary steps to address any deficiencies or revise the timeline and document its files. Each recommendation proposed in the AI includes a timeframe for completion in periods of one, three, and five years, or on an ongoing basis.

### **Recordkeeping**

A key element of the monitoring process is recordkeeping. The City should maintain a fair housing file where all actions taken are recorded and updates are made on a regular basis. HUD requires that at a minimum, the file contain:

- A copy of the AI; and
- Records that show the grantee has taken actions to overcome the effects of impediments identified in the AI.

City staff shall maintain information in the fair housing file through the use of the suggested Fair Housing Compliance File Checklist.

### **Reporting**

In addition to the ongoing self-assessment, the City will prepare its Consolidated Annual Performance Evaluation Report (CAPER), explaining how the jurisdiction is carrying out its housing and community development strategies, projects, and activities. As part of the report, the City must describe how it is carrying out its certification to affirmatively further fair housing by a) identifying the actions taken during the year; b) providing a summary of impediments to fair housing choice in the AI; and c) identifying actions taken to overcome effects of impediments identified in the AI.

### **Mid-period Assessment**

The AI is typically updated every five years. However, much can change within a five- year span of time and as such, it is recommended that the City conduct a mid-period assessment. The purpose of the mid-period assessment is to take a comprehensive look at the community in light of the changes that

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have been made due to the implementation of the actions outlined in the fair housing action plan, and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice. The mid-period assessment should be conducted at the end of the third year of implementation and should include the annual assessment for the year, as well as a cumulative review of the actions taken and their impact for the three- year period.

The City should compile and include the following in the mid-period assessment:

- Population demographic data relating to race, ethnic group, sex, age, and head of household;
- Characteristics of program beneficiaries;
- Affirmative marketing strategy and actions;
- Discrimination complaints filed and trends;
- Amendments or revisions to policies impacting land development, site selection, and zoning;
- Actions taken to affirmatively further fair housing; and
- Results of any needs assessments or studies for the area impacting fair housing.

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## Fair Housing Compliance File Checklist

Grantee: \_\_\_\_\_ Fiscal Year: \_\_\_\_\_

DATE	DESCRIPTION
	Current Consolidated Plan section applicable to Fair Housing
	Analysis of Impediments to Fair Housing Choice
	Annual Resolution or Proclamation of Fair Housing Month
	A summary report of all activities related to the AI
	List of the actions taken during the program year
	Notice of public meetings showing the fair housing and equal opportunity logo. Should also include language providing for accommodations for persons with Limited English Proficiency, disabilities including the hearing impaired.
	Summary or transcript of all public meetings, hearings, and citizen comments or other public input
	Sign-in sheet or list of attendees at public meetings or hearings
	Fair housing brochures and publications including subrecipient educational material
	Information about housing discrimination complaints and the disposition of each
	Notice of training or workshops regarding fair housing and list of attendees
	Description of funding or fair housing providers and bi-annual reports from such agencies
	Studies or reports evaluating the impact of the actions undertaken including applicable sections of its required CDBG Annual Report CAPER to HUD.
	Other:

## Appendix 1- Glossary of Maps, Tables, Figures

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## Appendix 2- Status of Prior 2010 Impediments

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$)
<p><b>Impediment: Education and Reporting:</b> Underreporting of fair housing discrimination cases due to both a lack of public education and limited awareness of some fair housing rights and lack of an adequate reporting system. Inadequate access to fair housing education and outreach efforts.</p> <p><b>Action: Improve citizen's knowledge of their fair housing rights</b></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. <i>Dedicate a portion of the city's website to fair housing, with <b>direct</b> links to websites with information about filing fair housing complaints (e.g., Attorney General, HUD, and Arizona Community Legal Services)."</i></p>	<p>The city has a link on the Community Revitalization web site which is a direct link to <a href="http://www.azfairhousing.com">www.azfairhousing.com</a>. This website is dedicated to fair housing issues and provides lots of information about fair housing.</p>	
	<p>2. <i>Expand the City's fair housing campaign, with a goal to increase citizen's knowledge about where to report fair housing complaints. Utilize radio, television, public presentations, flyers, and newspaper ads and make fair housing presentations at community events."</i></p>	<p>Fair Housing Events were held in June of 2013 &amp; 2014. The city partnered with Community Legal Services for the event and over 1500 flier were sent out to interested parties informing them about the event.</p>	\$6,000
	<p>3. <i>Facilitate access to the City's cable television channel(s) as a source of fair housing information and public education efforts.</i></p>		
	<p>4. <i>Expand fair housing educational workshops and materials to the West Maricopa County Regional Association of Realtors, local realtors, and other housing providers</i></p>	<p>Community Legal Services has held a series of workshops to educate housing providers and the general public about fair housing issues. These have resulted in some one on one consultation with citizens by Community Legal Services Attorneys.</p>	
	<p>5. <i>Continue to dedicate and increase funds from CDBG and other sources to fair housing, education, outreach, and enforcement.</i></p>	<p>Each year CDBG funds are provided to Community Legal Services to promote and provide legal assistance for fair housing.</p>	\$24,000
<p><b>Impediment: Discrimination Related to Rental Properties:</b> Some landlords not renting to protected class members. Also, some realtors may be steering minority renters to certain areas.</p> <p><b>Impediment: Discrimination Related to Owned Properties:</b> Some realtors and housing development sales staff</p>	<p>1. <i>Distribute fair housing materials to community centers, libraries, social service providers, and housing authority offices and private housing developments.</i></p> <p>2. <i>Create and distribute a Tenant-Landlord Handbook for Glendale citizens.</i></p>	<p>Fair Housing information can be found in the Community Revitalization Lobby, Public Libraries, Community Housing and our Park and Recreation Centers.</p>	
	<p>3. <i>Establish and conduct mandatory orientation sessions on fair housing for landlords under</i></p>	<p>Community Housing conducts Mandatory Orientations with New Landlords on an appointment basis yearly.</p>	

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$)
<p>may be steering homebuyers towards certain areas. Sales in certain neighborhoods not deemed as profitable and the subsidy process considered onerous. Also, lenders less likely to originate loans or charge higher fees in minority and lower income neighborhoods.</p> <p><b>Action: Improve fair housing enforcement</b></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	<i>the housing authority's Section 8 rental program</i>		
	4. <i>Provide CDBG funding for fair housing testing activities.</i>	Previous action taken. No current action	
	5. <i>Secure fair housing testing data for Glendale by contracting with Community Legal Services (CLS), and establish a specific time for review and analysis of the data by CLS (annually or bi-annually).</i>	No action taken	
	6. <i>Ensure that ongoing reporting data is monitored for areas of existing discrimination and trends.</i>	No action taken	
	7. <i>CLS provide the city with a more accurate breakdown of its cases, as well as an analysis of the type of bias experienced for each case</i>	No action taken	
<p><b>Impediment: Lack of Sufficient Affordable Housing Choices:</b> As well as lack of incentives such as density bonuses, fee waivers, etc. for affordable housing</p> <p><b>Action: Continue to keep housing affordable to Glendale residents</b> <b>Action: Continue to improve citizen's knowledge of home buying processes and credit risks</b></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	1. <i>The City should implement a plan and continue to fund affordable housing needs and leverage those funds with other funds.</i>	Fair Housing needs and issues are address in our 5 year Consolidated Plan and Annual Action Plan. CDBG funding is allocated each year to Community Legal Services to promote fair Housing education and assist citizens with issues.	
	2. <i>The City should apply for additional HUD Section 8 vouchers as they are available.</i>	No new HUD Section 8 vouchers have been available for release to public housing in the last 3 years.	
	3. <i>Increase citizen's awareness of social service and housing assistance programs available to them through additional marketing of programs.</i>	Fair Housing information is available in a number of locations in the city and on the city website.	
	4. <i>Increase funding for housing counseling services and leverage resources such as scholarships to NeighborWorks training. Also, work with local financial institutions to sponsor housing counseling certification.</i>	Funding for housing counseling was made available through NSP 1 and NSP 3 grants. New homebuyers were required to complete an 8 hours HUD certification class on housing and financial education prior to being able to purchase an NSP property.	
<p><b>Impediment: Lack of Accessible Housing:</b> Builders could be better</p>	1. <i>Provide builders with information packets regarding ADA requirements and post ADA</i>	ADA modifications are available through our single family rehabilitation program and through the Glendale Home	\$571,594



Analysis of Impediments to Fair Housing Choice, April 2015  
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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$)
<p>informed about Americans with Disabilities Act (ADA) requirements on the City's website, in permit applications/package, and the design review process especially for single-family construction.</p> <p><b>Action: Provide more ADA information for builders</b></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	<p><i>requirements on the City's website; as well as incorporate ADA requirements in the development review and permitting process for regular single-family construction.</i></p>	<p>Modification Program. In 2011 in Partnership with Gorman and Company, a 28 unit 3 bedroom fully ADA compliant apartment complex was constructed along Glendale Ave which is part of the city's Centerline Redevelopment effort.</p>	
	<p>2. <i>Retain information on ADA and the Fair Housing Act in the 2011 revision of the City's Zoning Ordinance and Commercial Design Guidelines.</i></p>	<p>The City's Design Guidelines currently require ADA compliance.</p>	
	<p>3. <i>Consider addressing the apparent deficit of ADA accessible affordable housing by having the Glendale Commission on Persons with Disabilities conduct a comprehensive review of the ADA accessible housing supply and demand to support the development and/or retrofitting of additional ADA accessible units.</i></p>	<p>The Commission will continue to have ongoing dialogue with regards to the supply of ADA accessible housing throughout Glendale and what could be done to encourage more.</p>	
	<p>4. <i>Continue to enforce the Arizonans with Disabilities Act and the associated guidelines.</i></p>	<p>The City works to comply with the Americans with Disabilities Act in a variety of ways including staffing the Commission on Persons with Disabilities.</p>	
<p><b>Impediment: Inadequate Public Transportation:</b> Reduced funding of transportation programs, restricted overall hours of operation, and the lack of reduced fare options during service hours.</p> <p><b>Action: Increase support to transportation initiatives</b></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. <i>Increase funding and support for transportation initiatives to provide better access to housing opportunities and employment opportunities.</i></p>	<p>The planning and discussion continues with linking the centerline area with other transportation corridors that will allow access to employment and health care providers.</p>	
	<p>2. <i>Continue to be part of efforts to improve public transportation in the Phoenix MSA in an effort to strengthen the employment, transportation, and housing links in Glendale and surrounding areas.</i></p>	<p>The City is a member of the regional transportation authority.</p>	

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$)
<p><b>Impediment:</b> <i>Formal Mechanism for Regional Solutions to fair housing issues.</i></p> <p><b>Action:</b> <i>Continue other activities related to affirmatively furthering fair housing choice.</i></p> <p><b>Does the City still consider this an impediment? (Check one below)</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. Support the establishment of a metro area Fair Housing Advisory Committee that will include a regional approach to fair housing issues and education.</p>	<p>The Maricopa County Consortium is working on formulating an analysis to fair housing plan on a regional basis that recognizes and respects the uniqueness of each individual member city.</p>	
	<p>2. The City should continue proactive code enforcement policies and practices.</p>	<p>The City will continue a proactive code enforcement approach in low-to-moderate income areas with the allocation of Community Development Block Grant Funds to help cover the cost.</p>	<p>\$34,615.18</p>

## Appendix 3- Staff Response and Fair Housing Planning Matrix

REMEDIAL ACTION RECOMMENDED	STAFF RESPONSE	ACTIONS TO BE UNDERTAKEN	TIME FRAME
<b>ACTIONS TO ADDRESS PREVIOUSLY IDENTIFIED IMPEDIMENTS</b>			
<b>A. Impediment: Some landlords not renting to protected class members. Also, some realtors steering minority renters and homebuyers towards certain areas.</b>			
<b>Action: Improve fair housing enforcement.</b>			
<b>Recommendation 1:</b> Provide CDBG funding for fair housing testing activities.			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input checked="" type="checkbox"/>
<b>Recommendation 2:</b> Secure fair housing testing data for Glendale by contracting with Community Legal Services (CLS), and establish a specific time for review and analysis of the data by CLS (annually or bi-annually).			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input checked="" type="checkbox"/> 5 years <input type="checkbox"/>
<b>Recommendation 3:</b> Ensure that ongoing reporting data is monitored for areas of existing discrimination and trends.			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input checked="" type="checkbox"/> 5 years <input type="checkbox"/>
<b>Recommendation 4:</b> CLS should provide the City with a more accurate breakdown of its cases, as well as an analysis of the type of bias being experienced for each case.	The city will work closely with CLS to provide data.	The city will work closely with CLS to provide data.	<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input checked="" type="checkbox"/> 5 years <input type="checkbox"/>
<b>B. Impediment: Formal mechanism for regional solutions to fair housing issues.</b>			
<b>Action: Continue other activities related to affirmatively furthering fair housing choice.</b>			
<b>Recommendation 1:</b> The City should collect and maintain demographic data and socioeconomic characteristics of Glendale residents as well as data of housing supply and availability to ensure that as plans are developed the goals and objectives formulated are based on reliable information and account for all protected class members.		The city will create a system to collect data.	<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input checked="" type="checkbox"/>

REMEDIAL ACTION RECOMMENDED	STAFF RESPONSE	ACTIONS TO BE UNDERTAKEN	TIME FRAME
<b>ACTIONS TO ADDRESS CURRENT IMPEDIMENTS</b>			
<b>A. Impediment: Residents face challenges accessing public transportation especially special needs population members including persons with disabilities and homeless persons.</b>			
<b>Action: Increase access to public transportation and transit services for low- and moderate income persons, persons with disabilities, and other protected class members.</b>			
<b>Recommendation #A-1:</b> When conducting transportation planning and seeking funding opportunities to improve public transportation and infrastructure, the City should ensure that consideration is given to the transportation needs of protected class members as well as low- and moderate income persons. Attention should be given to the cost of utilizing transit services, service areas, availability and time of routes, fleet size for alternative transit services such as Dial-A-Ride, and access to employment opportunities		Meet with Transportation and Infrastructure Department to ensure consideration is given to the transportation needs of protected class members as well as low- and moderate income persons.	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b>B. Impediment: Shortage of affordable and accessible housing to meet the needs of persons with disabilities, elderly persons, families with children, and other protected classes.</b>			
<b>Action: The City of Glendale should analyze its policies and programs that assist the elderly, minorities, persons with disabilities, and families with children with the provisions of affordable housing choices.</b>			
<b>Recommendation #B-1:</b> Consider accommodating group homes under the same standards of other residential uses and ensure that restrictions on the citing of group homes does not exclude housing for persons with disabilities from residential areas and does not put undue hardship on operators of group homes.			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b>Recommendation #B-2:</b> In order to maintain or increase the level of homeownership in Glendale, the City should support the provision of services such as housing counseling, credit counseling, and foreclosure prevention counseling and		Continue to work with Habitat to provide counseling and assistance.	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>

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REMEDIAL ACTION RECOMMENDED	STAFF RESPONSE	ACTIONS TO BE UNDERTAKEN	TIME FRAME
assistance with the goal of reaching an increased number of minorities and low- and moderate income households.			
<b>Recommendation #B-3:</b> The City should work toward increasing leveraging as far as possible with private sector funds and other public funding for the development of a variety of affordable housing units suitable for different types of households. The City should also implement land use policies which encourage the construction of affordable and accessible housing for lower income families.			<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b>C. Impediment: Discriminatory lending practices may be disproportionately impacting minority populations based on loan denial rates.</b>  <b>Action: The City should work with lenders in Glendale and request that they review their underwriting standards to determine that loan decisions are being made equitably.</b>			
<b>Recommendation #C-1:</b> The City should coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.		The city will meet with lenders to ensure lending practices are not discriminatory.	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b>D. Impediment: Lack of or inadequate fair housing education and enforcement in the rental community, as well as within the minority community.</b>  <b>Action: Continue fair housing education and outreach and expand opportunities for fair housing training.</b>			
<b>Recommendation #D-1:</b> The City of Glendale should expand its fair housing education and outreach efforts by increasing the number of public meetings, the creation and distribution of fair housing literature, English and bilingual radio and television advertisements, and more visible information on the City's website to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.		Continue efforts to educate the public of fair housing.	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>

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City of Glendale, Arizona

REMEDIAL ACTION RECOMMENDED	STAFF RESPONSE	ACTIONS TO BE UNDERTAKEN	TIME FRAME
<b>Recommendation #D-2:</b> Facilitate access to the City's cable television channel(s) as a source of fair housing information and public education efforts.			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b><i>E. Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.</i></b>  <b><i>Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.</i></b>			
<b>Recommendation #E-1:</b> The City of Glendale should work with its partners to promote education and awareness about mental disabilities and encourage its public housing Division to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.		Continue to work with the Community Housing Division to promote education and awareness about mental disabilities and provide reasonable accommodation	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b><i>F. Impediment: Lack of awareness of the demographics and needs of protected class members in the City's planning process may hinder proactive responses to housing needs and choices.</i></b>  <b><i>Action: Align planning efforts to reflect the changing demographics of the City and ensure the needs of all residents are considered.</i></b>			
<b>Recommendation #F-1:</b> The City should include protected class demographic data in its planning process including data on mental disabilities, if available.			<b>Check one</b> Ongoing <input type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>
<b>Recommendation #F-2:</b> The City should review its planning concepts of affordable housing and diverse communities contained in the Comprehensive Plan and develop strategies to make these more of a reality using HUD resources and national best practices		The city conducts a market study before planning affordable housing.	<b>Check one</b> Ongoing <input checked="" type="checkbox"/> 1 year <input type="checkbox"/> 3 years <input type="checkbox"/> 5 years <input type="checkbox"/>



## Appendix 4- Public Meeting Notices

AFFIDAVIT OF PUBLICATION

### THE ARIZONA REPUBLIC

STATE OF ARIZONA }  
COUNTY OF MARICOPA } SS.

**PUBLIC NOTICE**  
**CITY OF GLENDALE**  
**PUBLIC NOTICE AND SOLICITATION OF PUBLIC COMMENTS**  
**FOR FY 2015-19 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)**

The City of Glendale is soliciting public comments for the FY 2015-19 Analysis of Impediments to Fair Housing Choice (AI) plan.

The City of Glendale as an entitlement jurisdiction is required to complete a fair housing study, Analysis of Impediments to Fair Housing Choice (AI), to ensure that HUD-funded programs are being administered in a manner that furthers fair housing for protected classes. This AI is a review of Glendale's impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

**AVAILABILITY OF FY 2015-19 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) (DRAFT)**

Copies of the City of Glendale's draft AI for FY 2015-19 will be available for review from April 20, 2015 to April 30, 2015, at the following city location:

1. Community Revitalization, 5850 W. Glendale Avenue, Suite 107

The draft AI can be reviewed online on the city of Glendale website as follows:  
<http://www.glendaleaz.com/CommunityPartnerships/PlansandAssessments.cfm>, under the heading **Analysis of Impediments to Fair Housing Choice (AI) (DRAFT)**.




Comments regarding the AI may be made on or before **April 30, 2015**, and should be directed to Gilbert Lopez, Revitalization Manager, Community Revitalization, 5850 W. Glendale Avenue, Suite 107, Glendale, AZ 85301, Phone Number (623) 930-3670, Fax (623) 435-8594. Hearing impaired persons, please use the Arizona Relay Service Number 711 or Glendale TDD (623) 930-2197.

If you wish to provide input for consideration via e-mail, please send to: [Con-Plan@GlendaleAZ.com](mailto:Con-Plan@GlendaleAZ.com)

For additional information regarding this process, please contact Gilbert Lopez, Community Revitalization Manager for the City of Glendale at (623) 930-3670 or at [glopez@glendaleaz.com](mailto:glopez@glendaleaz.com).

**Asistencia en español:** Para que le interpreten la solicitud en español, llame al (623) 930-3670.

PUBLISH: The Arizona Republic  
April 17, 2015

I, first duly sworn, upon oath deposes and says that the foregoing is a true and correct copy of the advertisement published in the Arizona Republic, a newspaper of general circulation in the County of Maricopa, State of Arizona, by Phoenix Newspapers Inc., the Arizona Republic, and that the foregoing is a true copy of the advertisement as it appeared on the dates as indicated.

Arizona Republic  
Pages 18/9

Sworn to before me this  
17<sup>TH</sup> day of  
April A.D. 2015



**BRIAN BILLINGS**  
Notary Public - State of Arizona  
MARICOPA COUNTY  
My Commission Expires  
July 25, 2018

  
Notary Public

## **Appendix 5- Public Comments**

NO PUBLIC COMMENTS WERE RECEIVED AFTER THE 10-DAY PUBLIC COMMENT PERIOD

Community Revitalization Division  
City of Glendale, Arizona  
5850 W Glendale Avenue  
Glendale, AZ 85301

Phone: (623) 930-3670  
Fax: (623) 435-8594  
TDD (623) 930-2197  
AZ Relay Service Number 711

